

UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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DAVID ELLIOT WERKING  
An Indiana Resident, Plaintiff

v.

Case No. 1:19-cv-276  
Hon. Paul L. Maloney

BETH EILEEN WERKING, AND  
PAUL MICHAEL WERKING,  
Michigan Residents, Defendants

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**WRITTEN DAMAGES SUBMISSION REQUESTING DENIAL OF TREBLE  
DAMAGES AND ATTORNEY'S FEES**

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## **I. Law and Analysis**

There are three issues in regards to the damages that may be awarded to plaintiff. The first is the actual damages that Plaintiff incurred. The second is the potential trebling of these damages as permitted by MCL § 600.2919a(1). The third is the potential awarding of attorney fees under MCL § 600.2919a(1).

### **1. Plaintiff Should Be Limited To Actual Damages.**

The actual damages incurred by Plaintiff are vague at best. In his initial pleadings, Plaintiff included a list of items that he asserted were the titles of pornographic material that he had possessed and that had not been returned to him. They were attached as Plaintiff's Exhibits 5 and 6. These exhibits contained duplicative titles as well as titles with spelling errors and discrepancies in the labeling between the two exhibits. These exhibits were provided to Dr. Victoria Hartmann, Director of the Exotic Heritage Museum for purposes of valuing the collection. Dr. Hartmann has previously valued large collections of pornographic material in the course of her directorship both for display and private sale purposes, making her one of the only experts available for such valuations. Such was the incomprehensible nature of the lists, however, that her initial report did not consider all titles. Her report was supplemented following her deposition and the final valuation, based solely on the titles listed in the exhibits totals \$30,441.54 with a margin of error of \$3,000 to account for any duplicate titles that were not eliminated between the lists.

As to the veracity of the lists themselves, Plaintiff admitted in his deposition that these lists were created from memory rather than done by inventory for the purpose of listing assets in his divorce proceeding. Even though the report from Dr. Hartmann shows a value of \$30,441.54 for replacement value of the titles listed, her report was generated on a list made by plaintiff when recalling his items from memory rather than a proper itemization. Further, some titles listed in Exhibit 5 are

listed differently in Exhibit 6 – with different spelling or using disc instead of volume or vice versa. Had Plaintiff generated this list from an inventory, these discrepancies would not exist. Further, Plaintiff could not recall release dates, production houses, or other important information in determining the accuracy of the information, which would all have been available had the list been generated as an inventory rather than attempted recollection. A number of the titles that Defendants submitted to the Ottawa County Sheriff's Department as potential contraband were not on the either list in Exhibit 5 or 6. The missing information, the discrepancies in listings, the attempted recall of titles rather than methodical inventory, and the missing items makes that list suspect as to its accuracy. Further, if the list was inaccurate, the valuation done by Dr. Hartmann is also inaccurate, despite her experience and best efforts.

Regardless of the exhibits, Plaintiff only had purchase receipts to verify his ownership of 1208 titles, of which 16 were duplicates showing multiple copies of the same title – far fewer than the 2033 he claims to own on Exhibit 6 (428 VHS titles and 1605 DVD titles). These receipts equal a total damage amount of \$11,602.92. Whether Plaintiff actually owned the remaining titles, or whether they were merely desired – a “wish list” – or had been watched without purchase of the material, is unknown.

“Black’s Law Dictionary (8th ed) defines ‘actual damages’ as: ‘An amount awarded to a complainant to compensate for proven loss; damages that repay actual losses.’ Applying this definition to MCL 600.2919a, ‘actual damages’ means the actual loss a complainant suffered as a result of a defendant’s conduct.” *Alisa A. Peskin-Shepherd, PLLC v. Blume*, 2020 Mich. Ct. App. No. 348023 *citing Alken-Ziegler*, 283 Mich.App. at 102-103. In the instant case, plaintiff can definitively prove \$11,602.92 worth of damages with his receipts.

Because plaintiff cannot prove his actual losses beyond the receipts provided, which account for \$11,602.92, and due to the dubious nature of the lists created by plaintiff, the award of actual

damages should be confined to the provable losses – \$11,602.92.

## 2. Plaintiff Should Not Be Awarded Treble Damages.

In *Aroma Wines*, the primary source of statutory conversion case law in Michigan, the Michigan Court of Appeals wrote that “MCL 600.2919a(1) provides that a person damaged under the statute ‘*may* recover 3 times the amount of actual damages sustained, plus costs and reasonable attorney fees.’ ... The term ‘*may*’ is permissive and indicates discretionary activity.” *Aroma Wines & Equip., Inc. v. Columbian Distrib. Servs., Inc.*, 844 N.W.2d 727, 732 (Mich Ct. App. 2013) (citation omitted). Since the finding in the *Aroma Wines* decision, Michigan courts have followed the “permissive” rather than the “mandatory” guidelines.

While there exists a published decision requiring trebling that predates the court of appeals’ finding in *Aroma Wines*, the court of appeals declined to follow its earlier opinion when they made their decision in *Aroma Wines*. In fact, the decision in *Aroma Wines* specifically cites to that case, though for other purposes. That case is *Alken-Ziegler v. Hague*, 767 N.W.2d 668, 671 n.6 (Mich. Ct. App. 2009). Rather than rely on their decision regarding the trebling of damages established in the earlier *Alken-Ziegler* case, the court instead relied on two unpublished decisions for its decision that treble damages are permissive rather than mandatory, stating “whether to award treble damages is a question for the trier of fact, and we cannot simply order treble damages upon a finding of conversion. This Court has come to this conclusion previously in its unpublished decisions.” *Aroma Wines* at 732.

The fact that the court in *Aroma* used *Alken-Ziegler* while neglecting to follow the trebling of damages shows that, while they were aware of the precedent set regarding the trebling of damages in it, they specifically chose to follow the more lengthy history of Michigan courts following the ‘permissive’ standard of trebling. Though *Alken-Ziegler* remains good law, the fact that the court has chosen in later cases not to follow it should be precedential and guide this Court to find that MCL

§600.2919a provides for permissive, rather than mandatory, trebling. Accordingly, this Court should follow the court in *Aroma* by not awarding treble damages. Plaintiff should be limited to the actual damages without trebling of \$11,602.92.

### **3. Plaintiff Should Not Be Awarded Attorney's Fees.**

Under the “American rule,” as cited by *Reed v. Reed*, “attorney fees are not recoverable as an element of costs or damages unless expressly allowed by statute, court rule, common-law exception, or contract.” *Reed v. Reed*, 693 N.W.2d 825, 845 (Mich. Ct. App. 2005), citing *Dessart v. Burak*, 678 N.W.2d 615 (Michigan 2004). One such common-law exception is “that an award of legal fees is authorized where the party requesting payment of the fees has been forced to incur them as a result of the other party’s unreasonable conduct in the course of litigation.” *Id.*

In the instant case, MCL §600.2919a provides for the permissive awarding of attorney’s fees, specifically providing that “a person damaged as a result of [statutory conversion] *may* recover 3 times the amount of actual damages sustained, plus costs and reasonable attorney fees.” In the same way that treble damages are permissive under this statute, the awarding of attorney fees and costs are also permissive.

Further, Defendant’s conduct was not unreasonable, merely vigorous defense of their actions. In *Thames v. Thames*, the court defined unreasonable conduct as “unnecessarily prolonging the proceedings by making spurious claims and allegations.” *Thames v. Thames*, 477 N.W.2d 496, 503 (Mich. Ct. App. 1991). In the instant case, no action was taken to intentionally and unnecessarily prolong the proceedings nor was any argument made in bad faith. Though this Court ultimately decided against Defendants on the issue of statutory conversion, no action was taken without some legal basis or with the intention of delaying the proceedings. “The mere fact that litigation has been lengthy is not by itself reason to conclude misconduct has occurred.” *Reed* at 846. Further, if mere

good faith, diligent efforts to defend a suit give rise to the shifting of attorney fees, no defense will ever be undertaken due to fear of the risk of incurring double the attorney's costs – the defending party's plus the plaintiff's. This would have a chilling effect on litigation at best, and would create an adverse public policy as it would encourage bad faith actors to file spurious lawsuits in order to collect settlements when defendants fear having to pay double costs should they undertake a good faith defense.

## Conclusion

Though the valuation made by Dr. Hartmann was in the ballpark of Plaintiff's original demand, that valuation was based on a list generated by Plaintiff and of dubious accuracy as to the contents of the actual collection. Through the discovery process, Plaintiff was only able to produce and substantiate \$11,602.92 of actual losses. The amount of damages awarded to him, therefore, should be contained to those actual, provable losses.

Further, Michigan courts have historically not awarded treble damages when the award was permissive rather than mandatory, as is the case here. In the seminal case on statutory conversion, the court failed to follow its own precedent and instead created the new precedent of *not* awarding treble damages. For this reason, this Court should follow the standard set in *Aroma Wines* and also not award treble damages.

Similarly, this Court should also not award attorney's fees as Defendant's actions were made in a good faith attempt to defend against what they saw as lawful actions – their house, their rules. At no time did they attempt to delay proceedings or engage in unnecessary or unreasonable conduct. However, as is the nature of litigation, proceedings were protracted to determine the validity of the claims and reach an accurate valuation of damages.

The law permits this Court to award punitive damages of trebling and attorney's fees, but no action of the Defendants warrant the taking of punitive measures, nor does established case law



support it. This Court should not ignore the tradition of Michigan courts or the actions made by the Court of Appeals in *Aroma Wines* of ignoring their own precedent regarding trebling to establish new precedent of *not* trebling and should award Plaintiff actual damages only, for a total award of \$11,602.92.

Dated: March 1, 2021

VANDEBROEK LAW PLLC

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## **List of Exhibits and Depositions**

Exhibit 1	Dr. Victoria Hartmann Report on Destroyed Property
Exhibit 2	Dr. Victoria Hartmann Spreadsheet of Destroyed Property
Deposition 1	Dr. Victoria Hartmann Deposition
Deposition 2	David Werking Deposition

Exhibit 1

Dr. Victoria Hartmann Report on Destroyed Property

# Appraisal Report

Victoria Hartmann, Ph.D.  
January 2nd, 2020

Self-Contained Appraisal Report for A Collection of Pornographic Film

Intended Use: Substantiate a Replacement Cost

Type of Value: Fair Market Value

Client: Paul and Beth Werking

Case #1:19-cv-00276

Appraised by: Victoria Hartmann, Ph.D.

Date of Appraisal: December 17th - 24th, 2020

Effective Date of Appraisal: December 27th, 2020

Date of Report: January 2nd, 2021

Updated: February 24th, 2021

### INTENDED USE AND USERS

The intended use of this appraisal is limited to substantiating a replacement value for a previously existing collection of adult films. The intended users of this report are limited to the plaintiff and financial and legal representatives.

### VALUE DEFINITION

The type of value used in this appraisal is fair market value.

### DEFINITION OF VALUE

Fair Market Value is the price at which property changes hands between a willing buyer and a willing seller, neither having to buy or sell, and both having reasonable knowledge of all the relevant facts.

(From IRS Publication 526 (2019), *Charitable Contributions*, p. 11.)

### APPROACH TO VALUE

The following approaches to value are commonly used in the appraisal of personal property:

**The Cost Approach to Value** concludes either reproduction for replacement cost of a

property, either new or depreciated.

**The Income Approach to Value** concludes the present worth of anticipated future benefits of owning income-producing properties or objects.

**The Market Comparison Approach to Value** estimates value by comparison with properties sold in the relevant market, with adjustments for all differences that affect value, such as differences in characteristics of value, in provenance, and in time exposed to the market in order to arrive at the opposite conclusion of value.

(From Soucy, Patricia C. and Smyth, Janella N., Eds. *The Appraisal of Personal Property: Principles, Theories, and Practice Methods for the Professional Appraiser*. Washington. D.C.: The American Society of Appraisers, 1994, p.19)

Each of these approaches was considered for this appraisal.

1. These films are mass produced for the marketplace. Mr. Werking is not required to re-film or re-record these films in order to replace them. As such, the Cost Approach to Value was not used.
2. Comparatives to other (or the same) films in the market place were applicable, as these films are easily found for the most part for purchase, and their value would not be more or less based on unique aspects of the films. Thus, the Market Comparison Approach was utilized here.

3. Mr. Werking did not produce these films, nor was he part of the original production.

He did not purchase the original reels of these films, nor does he own exclusive distribution rights. Mr. Weking would not generate income from these films. Thus, the Income Approach to Value was not applicable in this appraisal.



## NARRATIVE

According to media reports, in the lawsuit Werking v. Werking, Case #1:19-cv-00276, filed in Michigan Western District Court, David Werking said that, after a divorce, he had lived rent-free in his parents' Grand Haven home for about a year. In August 2017, he moved out "at the request of local law enforcement," leaving many of his possessions behind.

A few months later, his parents — Paul and Beth Werking — delivered some of the possessions he had been asking that they return. He noticed items were missing. In an email, he said, his father told him: "We counted twelve moving boxes full of pornography plus two boxes of 'sex toys' as you call them. We began that day the process of destroying them and it took quite a while to do so."

District Judge Paul Maloney granted David Werking's request for summary judgment on November 10th, 2020.

On December 15th, 2020, the law firm VanderBroek Law PLLC, representing the Defendants, contacted me for a formal appraisal of the collection.

The collection consisted of 2289 adult films from the mid 1970's until the mid 2000's.

## RESEARCH

The question of the value of pornography continues to be hotly debated both in popular culture and in academia. Does pornography have value? If so, how do we determine such a thing? Does it have intrinsic value, or do we base the value of pornography simply from a financial perspective - considering the cost of production, the cost of distribution, and the cost to the customer purchasing a film.

Michael Rea (2001), one of the few authors who has devoted an essay to the issue of defining pornography, proposes the following:

$x$  is pornography if and only if it is reasonable to believe that  $x$  will be used (or treated) as pornography by most of the audience for which it was produced.

Before we explore the conditions of the proposition presented, let us take a brief look at the history of the mainstreaming of pornography.

The mainstreaming of pornography is indebted to the success of feature-length hardcore films of the 1970's. These films were shot on 35mm, had story-esque narratives, were screened both in the USA and internationally, and for their time, had bigger budgets than prior at-home filmed sexual encounters, which were non-commercial. Films such as *Deep Throat* (1972), *Behind the Green Door* (1972), *The Devil in Miss Jones* (1973), *The*

Opening of *Misty Beethoven* (1976) and *Debbie Does Dallas* (1978). These films have since been established as classics (Buscombe 2004: 30). Porn historiography characterizes the 1970's as an era of sexual, and even artistic, exploration, unhinged by AIDS, and of adult film-making undisturbed by video technology or the economic dictates of the porn industry, as we see today. The 1970's were about the convergence of independent art film-makers and pornographers. The artistic avant-garde saw porn as a means to explicitly critique sexual mores; while pornographers saw the possibility of attracting liberal mainstream audiences through artful films (Patton 2000: 258, also Wyatt 1999).

As the porn industry has evolved and changed, so to have academic and social attempts to define pornography at each stage of it's evolution, from it's features in mainstream theaters, to it's introduction in to the privacy of viewers homes through the mediums of VHS, and later, DVD; and now it's wide availability through streaming and online sources.

Coming back to how we define the value of pornography. Arguments have been made that while art is largely valued intrinsically; a painting can be valued for its composition, regularity, harmony, uniqueness, balance, tension, diversity and complexity; pornography is primarily viewed instrumentally. Pornography is usually considered a depiction of explicit sexual subject matter meant to arouse and sexually excite the viewer. Michael Rea (2001), specifies what it means for someone, *S*, to use something, *x*, as pornography. He lists 4 conditions (2001: 120):

1. *x* is a token of some sort of communicative material

2. S desires to be sexually aroused or gratified by the communicative content of  $x$
3. if S believes that the communicative content of  $x$  is intended to foster intimacy between S and the subject(s) of  $x$ , the belief is not among S's reasons for attending to  $x$ 's content
4. if S's desire to be sexually aroused or gratified by the communicative content of  $x$  were no longer among S's reasons for attending that content, S would have at most a weak desire to attend to  $x$ 's content.

As we see in the argument proposed by Michael Rea, the pivotal term in his definition is the term "use". The term use implies the commoditization of an "thing", or more simplistically, to put into action or service; to expend or consume; to carry out purpose or action by means of utilization.

While debates amongst scholars continue to explore the artistic and intrinsic value of pornography, in my professional opinion Michael Rea's proposed conditions are the most applicable to this case - pornography is for "use"; a commodity. As such, I have evaluated this collection based on its current monetary value; i.e. the cost of replacement for the purpose of consumption, in today's market.

These come in two forms; DVD and online download. Preference has been given to DVD when available and dependent on each online source at the time of this report, and based on the assumption that the plaintiff purchased the original items in either VHS or DVD format, and has preference for this medium.

## METHODOLOGY

In determining the value of this collection, I considered the 4 following criteria;

- Current cost

This criterion is divided into two parts. Is the film available in either DVD or digital (streaming) format? If so, preference was given to DVD format, as it appears the plaintiff purchased the video in either DVD or VHS format, as mentioned above.

- Current availability in the marketplace

The second criterion determines whether or not the film is still available in the marketplace for purchase.

- Initial distribution volume

The third criterion assesses if the initial distribution was of a mainstream nature (a “standard” release - thousands of copies distributed in adult retail chains or through mail order in the marketplace), or in a niche market (small number of copies released into the marketplace) or custom (one-of-a-kind film produced for the plaintiff alone)

- Porn industry-determined intrinsic value

The fourth criterion considers what was relevant to the adult film industry at the time of production. Is there a performer with mainstream crossover? Did the producer/director win several awards in the industry? In the case of this valuation,

the least amount of weight has been given to this criterion.

## RESEARCH TOOLS (EXHIBIT 5)

Due to increased availability of data (studio, year of production, etc), multiple online databases / websites were used to determine the previous 4 criteria. Effort was made to eliminate any duplicates with Exhibit 6.

- [www.adultdvdempire.com](http://www.adultdvdempire.com) (predominantly mainstream releases)
- [www.jeedoo.com](http://www.jeedoo.com) (Foreign, mainstream and fetish releases)
- [www.hightide-video.com](http://www.hightide-video.com) (fetish and unusual releases)
- [www.kompoz2.com](http://www.kompoz2.com) (mainstream reference)
- [www.xhamster.com](http://www.xhamster.com) (mainstream and camming releases)
- [www.adultempire.com](http://www.adultempire.com) (mainstream and some fetish releases)
- [www.adultfilmdatabase.com](http://www.adultfilmdatabase.com) (mostly mainstream releases dating back to the mid 70's)
- [www.adultdvdmarketplace.com](http://www.adultdvdmarketplace.com) (mostly mainstream releases)
- [www.iafd.com](http://www.iafd.com) (adult film database and documentary website)
- [www.ebay.com](http://www.ebay.com) (online marketplace)
- [www.hotmovies.com](http://www.hotmovies.com) (mainstream releases)
- [www.tubepornclassic.com](http://www.tubepornclassic.com) (classic adult film marketplace)
- [www.excaliburfilms.com](http://www.excaliburfilms.com) (misc adult film marketplace)

- [www.pornhub.com](http://www.pornhub.com) (tube site)
- [www.youporn.com](http://www.youporn.com) (tube site)
- [www.diabolikdvd.com](http://www.diabolikdvd.com) (misc film release marketplace)
- [www.popcorn.com](http://www.popcorn.com) (misc film release marketplace)
- [www.cduniverse.com](http://www.cduniverse.com) (mainstream adult film marketplace)
- [www.filesmonster.vip](http://www.filesmonster.vip) (misc film release marketplace)
- [www.imdb.com](http://www.imdb.com) (mainstream hollywood and film catalog website)
- [www.gamelink.com](http://www.gamelink.com) (streaming marketplace)
- [www.globaldatabase.ecpat.org](http://www.globaldatabase.ecpat.org) (reference)
- [www.aebn.com](http://www.aebn.com) (mainstream adult streaming marketplace)
- [www.vintage-erotic.net](http://www.vintage-erotic.net) (classic adult marketplace)
- [www.sugarinstant.com](http://www.sugarinstant.com) (streaming marketplace)
- [www.adultfilmcentral.com](http://www.adultfilmcentral.com) (adult film marketplace)
- [www.hentaiyes.com](http://www.hentaiyes.com) (manga and hentai adult marketplace)

A differentiation in valuation has been considered, when the items were either



discontinued, not found, or were unable to be valued, in the following five areas:

1. Mainstream materials. When a mainstream title was found but not available for sale (discontinued), and did not have any defining features (a celebrity name, a stand alone significant value), the replacement cost was averaged among the most common replacement costs. The averages of 89.99, 69.99, 29.99, 19.95, 14.95, 9.99, 6.99, 18, 59.99, 39.99 (the most common costs for the films listed, please refer to Exhibit B - 5 spreadsheet) is 35.983, which was rounded to 36.
2. Niche materials. Niche materials are defined by content. Beyond mainstream sexual content (in this case, heterosexual activity) niche materials are defined by; A. paraphilia aspects, such as an attention to feet, or urination, or lingerie (for example), and this may have a higher (or lower) cost. Paraphilia (previously known as sexual perversion and sexual deviation) is the experience of intense sexual arousal to atypical objects, situations, fantasies, behaviors, or individuals, and B. reduced or limited release into the marketplace. No consensus has been found for any precise border between unusual sexual interests and paraphilic ones. The averages of 89.99, 69.99, 29.99, 19.95, 14.95, 9.99, 6.99, 18, 59.99, 39.99 (the most common costs for the films listed, please refer to Exhibit B - 5 spreadsheet) is 35.983, which was rounded to 36, and applied to Niche materials.

3. Custom material. Custom materials are defined by a singular, or one-of-a-kind production, generally produced for the viewer only, and for which the performer and viewer negotiate a cost for production.
4. Non-Mainstream material. While films depicting animals and sexual activity are not defined as a prohibited form of speech (see *United States vs. Stevens*, 559 U.S. 460 (2010)), it is beyond the scope of this appraisal to determine the value of these films.
5. Vague or undefined titles/lack of studio or production information. While all titles were searched for and cross referenced based on studio or some word combination, some were not able to be located or identified.

As a result of increased data (studio, production date, etc), a wider spectrum of costs was found.

Based on the above 5 conditions, 47 films were unable to be evaluated. Total appraisal of the remaining 689 films: \$15,349.96. Please refer to the spreadsheet (Exhibit B - Spreadsheet titled "Exhibit 5") for each film's replacement cost.

### RESEARCH TOOLS (EXHIBIT 6)

Due to the limited data (no studio or production date, etc), one large online database / website was used to determine the previous 4 criteria. Effort was made to eliminate any duplicates with Exhibit 5.

- [www.adultdvdempire.com](http://www.adultdvdempire.com) (predominantly mainstream releases)

A differentiation in valuation has been considered, when the items were either discontinued, not found, or were unable to be valued, in the following five areas.

1. Mainstream materials. When a mainstream title was found but not available for sale (discontinued), and did not have any defining features (a celebrity name, a stand alone significant value), the replacement cost was averaged among the most common replacement costs. The averages of 29.99, 19.99, 14.99, 11.99, 9.99, 7.99, 5.59 (the most common costs for the films listed, please refer to Exhibit B - 6 spreadsheet) is 13.44, which was rounded to 14.

2. Niche materials. Niche materials are defined by content. Beyond mainstream sexual content (in this case, heterosexual activity) niche materials are defined by; A. paraphilia aspects, such as an attention to feet, or urination, or lingerie (for example), and this may have a higher (or lower) cost. Paraphilia (previously known as sexual perversion and sexual deviation) is the experience of intense sexual arousal to atypical objects, situations, fantasies, behaviors, or individuals, and B. reduced or limited release into the marketplace. No consensus has been found for any precise border between unusual sexual interests and paraphilic ones. The averages of 29.99, 19.99, 14.99, 11.99, 9.99, 7.99, 5.59 (the most common costs for the films listed, please refer to Exhibit B - 6 spreadsheet) is 13.44, which was rounded to 14, and applied to Niche materials.
3. Custom material. Custom materials are defined by a singular, or one-of-a-kind production, generally produced for the viewer only, and for which the performer and viewer negotiate a cost for production.
4. Non-Mainstream material. While films depicting animals and sexual activity are not defined as a prohibited form of speech (see *United States vs. Stevens*, 559 U.S. 460 (2010)), it is beyond the scope of this appraisal to determine the value of these films.
5. Vague or undefined titles/lack of studio or production information. While all titles were searched for and cross referenced based on title or some word combination, some were not able to be located or identified, or produced multiple results.

As a result of limiting data (a lack of studio, production date, etc), a smaller spectrum of costs was found, and largely available in download format.

Based on the above 5 conditions, 60 films were unable to be valued. Total appraisal of the remaining 1493 films: \$15,094.98. Please refer to the spreadsheet (Exhibit C - Spreadsheet titled "Exhibit 6") for each film's replacement cost. A preference was given to DVD media when available, but generally was available in download format as of this report.

Titles that could be valued from both Exhibit 5 and Exhibit 6 totalled \$30,441.54. While there could be duplicates from either Exhibits still remaining in this total, in my professional opinion such duplicates make a difference of perhaps + or - \$3000.00.

### LIMITING CONDITIONS

This appraisal report is made subject to the following limiting conditions:

1. The opinions of value reported are valid only for the effective date of the appraisal.
2. The appraisal is valid only for intended use, intended users, and type of value stated in the report.
3. This appraisal is valid only in its entirety and is invalid if any part of the report is missing or incomplete.
4. This appraisal report is confidential and intended to be used only by the client and the stated intended users. No confidential part of this report, including the value conclusions and the identity of the appraiser, shall be disseminated to the public through advertising, news, sales, public relations or other media without the prior written consent of the appraiser.
5. Delivery of this report to the client includes testimony in the court action. Once testimony has been provided, all contractual obligations will have been met.

### CERTIFICATION

I certify that, to the best of my knowledge and belief:

- The statements of fact contained in this report are true and correct.
- The reported analyses, opinions, and conclusions are limited only by the reported assumptions and limiting conditions and are my personal, impartial, and unbiased professional analyses, opinions and conclusions.
- I have no present or prospective interest in the property that is the subject of this report and no personal interest with respect to the parties involved.
- I have no bias with respect to the property that is the subject of this report or to the parties involved with this assignment.
- My engagement in this assignment was not contingent upon developing or reporting predetermined results.
- My compensation for completing this assignment is not contingent upon or reporting of the predetermined value or direction in value that favors the cause of the client, the

amount of the value opinion, the attainment of a stipulated result, or the occurrence of a subsequent event directly related to the intended use of this appraisal.

- Research assistance for the appraisal was provided by Mircalla McNeely and David Shindel, but the value opinion is entirely my own.

### QUALIFICATIONS

I hold a Doctorate degree in Human Sexuality (D.H.S.) and a Ph.D. in Human Sexuality with an emphasis on Clinical Sexology. My research focused on (and continues to focus on) unusual and paraphilic sexualities, in particular, paraphilic (or “extreme”) pornography. I have led research projects on pornography, including my most recent effort in assessing the attitudes of Erotic Heritage Museum guests towards pornography. I have co-authored or authored several papers and articles on pornography and porn use. I am also the Executive Director of the Erotic Heritage Museum; the only Museum to include, and research, pornography as a part of its ongoing projects and exhibits.



## References

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Exhibit 2

Dr. Victoria Hartmann Spreadsheet of Destroyed Property

Title	Description	Plaintiff Estimate Price	Quantity	Replacement Cost	Source	Notes (listing prices may vary over time due to market flux)	Unable To Determine
1591 Awesome Assets	(1987, 4-ply)	18	1	12.74	<a href="https://www.adultvidtemp.com/1519960/awesome-assets-porn-videos.html?as=Awesome%20Assets">https://www.adultvidtemp.com/1519960/awesome-assets-porn-videos.html?as=Awesome%20Assets</a>		Piss N'Fist
1519 Amy's Pissing Phantasies	Vol 2	50	1	36	<a href="https://www.bq.no/online-sale-price-listed">https://www.bq.no/online-sale-price-listed</a>		Pissing Passion
1520 Doc Pee		50	1	36	<a href="https://hphhdc.no/online-sale-price-listed">https://hphhdc.no/online-sale-price-listed</a>		Leasips
1521 Switch Hitters (Butt Fucking B)	series	9.62	1	14.95	<a href="https://www.teeboo.com/stream-download/vod_ms_73208-Switch-Hitters/">https://www.teeboo.com/stream-download/vod_ms_73208-Switch-Hitters/</a>		Preggo Piss
1522 Switch Hitters (My Husband Lo)	series	9.62	1	14.95	<a href="https://www.teeboo.com/stream-download/vod_ms_73208-Switch-Hitters/">https://www.teeboo.com/stream-download/vod_ms_73208-Switch-Hitters/</a>		XXXXBox
1523 Switch Hitters (Suck That Cock)	series	9.62	1	14.95	<a href="https://www.teeboo.com/stream-download/vod_ms_73208-Switch-Hitters/">https://www.teeboo.com/stream-download/vod_ms_73208-Switch-Hitters/</a>		Forced to Lactate 5
1524 Black Bible	disc 1	75	1	36	<a href="https://www.bq.no/online-sale-price-listed">https://www.bq.no/online-sale-price-listed</a>	36 <a href="https://www.bq.no/online-sale-price-listed">https://www.bq.no/online-sale-price-listed</a> this may be mis-listed. If so the correct title is Bible Black.	Last Condom
1525 Black Bible	disc 2	1	1	36			Sex Appraisals
1526 Black Bible	disc 3	1	1	36			Trouble
1527 Blackmail 2	disc 1	44	1	18.99	<a href="https://www.naughtyherald.com/the-blackmail-2-part-1.html">https://www.naughtyherald.com/the-blackmail-2-part-1.html</a>		Peeping Tom
1528 Blackmail 2	disc 2	1	1	18.99	<a href="https://www.naughtyherald.com/the-blackmail-2-part-2.html">https://www.naughtyherald.com/the-blackmail-2-part-2.html</a>		Animal Variety
1529 G-Taste	disc 1	39	1	13.29	<a href="https://www.adulttemp.com/1571959/G-Taste-head-waxe-porn-videos.html?as=G-Taste%20Head%20Wave">https://www.adulttemp.com/1571959/G-Taste-head-waxe-porn-videos.html?as=G-Taste%20Head%20Wave</a>		Designing Anal
1530 G-Taste	disc 2	1	1				Amateurs
1531 G-Taste	disc 3	1	1				Numbered Cassette
K304.86							Ultimate Horse
1532 Gorgeous Wet Georgette							Older Women Eat Pussy
1533 Piss N'Fist		50	1	36	<a href="https://www.hqhdhdc-video.com/georgette/move.php">https://www.hqhdhdc-video.com/georgette/move.php</a>		Muff Divers Delights
1534 Golden Swallow		50	1	36	<a href="https://homoc2.com/filid/golden.swallow">https://homoc2.com/filid/golden.swallow</a>	custom video?	Can't Get Enough Dog
1535 Pissing Passion		50	1	0		custom video?	Natural Assets
1536 Leasips		50	1	0		custom video?	Olivia
1537 Peenuts		50	1	24.95	<a href="https://b7amster.com/videos/peanuts-05sing-in-panties-0468150">https://b7amster.com/videos/peanuts-05sing-in-panties-0468150</a>		Best of International Lesbian Affair 2
1538 Liquid Lust		50	1	11.19	<a href="https://www.adulttemp.com/613252/liquid-lust-porn-movies.html">https://www.adulttemp.com/613252/liquid-lust-porn-movies.html</a>		Hard for Land
1539 Preggo Piss		50	1	0		custom video?	LNS6
1540 Amy's Pissing Phantasies	vol 5	50	1	36	<a href="https://www.hqhdhdc-video.com/filid/amy5.porn.videos.html">https://www.hqhdhdc-video.com/filid/amy5.porn.videos.html</a>		Girl Who SC and EC 6
1541 Switch Hitters (bisexual virgins)		9.62	1	14.95	<a href="https://www.teeboo.com/stream-download/vod_ms_73208-Switch-Hitters/">https://www.teeboo.com/stream-download/vod_ms_73208-Switch-Hitters/</a>		Young Lower
1355 Older and Anal 1	disc 1 (filmo 1995)	104	1	6.99	<a href="https://www.adulttemp.com/647355/older-anal-porn-videos.html">https://www.adulttemp.com/647355/older-anal-porn-videos.html</a>		Street Whore
K368.48							Goddesses
1356 Older and Anal 1	disc 2		1	6.99	<a href="https://www.adulttemp.com/647355/older-anal-porn-videos.html">https://www.adulttemp.com/647355/older-anal-porn-videos.html</a>		Stacy Nicholas Remembered
1357 Older and Anal 1	disc 3		1	6.99	<a href="https://www.adulttemp.com/647355/older-anal-porn-videos.html">https://www.adulttemp.com/647355/older-anal-porn-videos.html</a>		Talies Farts
1358 Older and Anal 1	disc 4		1	6.99	<a href="https://www.adulttemp.com/647355/older-anal-porn-videos.html">https://www.adulttemp.com/647355/older-anal-porn-videos.html</a>		Streamers
1359 Older and Anal 1	disc 5		1	6.99	<a href="https://www.adulttemp.com/647355/older-anal-porn-videos.html">https://www.adulttemp.com/647355/older-anal-porn-videos.html</a>		Streamers Sizzlers
1360 Older and Anal 1	disc 6		1	6.99	<a href="https://www.adulttemp.com/647355/older-anal-porn-videos.html">https://www.adulttemp.com/647355/older-anal-porn-videos.html</a>		Girls Who Screw Girls
1342 Milf Next Door 8	pulse, 2009	8	1	16.99	<a href="https://www.adulttemp.com/1889597/milf-next-door-8-porn-videos.html?as=MILF%20Next%20Door%208">https://www.adulttemp.com/1889597/milf-next-door-8-porn-videos.html?as=MILF%20Next%20Door%208</a>		Pregant
1313 End of the World	wvd, 2000	32	1	29.99	<a href="https://www.adulttemp.com/27542/end-of-the-world-porn-movies.html">https://www.adulttemp.com/27542/end-of-the-world-porn-movies.html</a>		Hooters
1308 Endlessly	wvd, 1993	28	1	19.95	<a href="https://hpr18.net/video/67108681/endlessly-1993">https://hpr18.net/video/67108681/endlessly-1993</a>		Drop Sex
1282 XXXBox	reravision, 2008	8	1	36	<a href="https://www.bq.no/online-sale-price-listed">https://www.bq.no/online-sale-price-listed</a>	Reravision does not list this title! it is listed under babydoll pictures - <a href="https://www.bq.no/online-sale-price-listed">https://www.bq.no/online-sale-price-listed</a>	Art of Sex
1248 Speedster	wvd, 1992	27	1	19.95	<a href="http://www.adulttemp.com/30370/speedster/">http://www.adulttemp.com/30370/speedster/</a>		Sim-A-Bun
1246 Just Do Me	wvd, 2006	34	1	10.49	<a href="https://www.adulttemp.com/1392982/just-do-me-porn-videos.html">https://www.adulttemp.com/1392982/just-do-me-porn-videos.html</a>		Lingerie Gallery
1103 Supermodel	wvd, 1994	26	1	14.95	<a href="https://www.adulttemp.com/1392982/just-do-me-porn-videos.html">https://www.adulttemp.com/1392982/just-do-me-porn-videos.html</a>		1 Swear I'm 18.89
1094 Forced to Lactate 5	spunky spur, 2000	100	1	0	<a href="https://www.bq.no/online-sale-price-listed">https://www.bq.no/online-sale-price-listed</a>	Spunky Spur Studios does not have this title listed	Night of The Vampires
1095 Forced to Lactate 7	totally tasteless, 2001	7		29.95	<a href="https://hpr18.net/video/mobile/6290595/forced-to-lactate-7">https://hpr18.net/video/mobile/6290595/forced-to-lactate-7</a>		Spunk Me
K1138.48							Strip 12
999 Double Air Bags 7	channel 69, 2002	34	1	14.99	<a href="https://www.adulttemp.com/50397/double-airbags-7-porn-movies.html">https://www.adulttemp.com/50397/double-airbags-7-porn-movies.html</a>		Tight Ass
1000 Big Clits Big Lips 3	channel 69, 2002	34	1	14.99	<a href="https://www.adulttemp.com/51393/big-clits-big-lips-3-porn-movies.html">https://www.adulttemp.com/51393/big-clits-big-lips-3-porn-movies.html</a>		
1001 Big Clits Big Lips 2	channel 69, 2002	17	1	14.99	<a href="https://www.adulttemp.com/51393/big-clits-big-lips-3-porn-movies.html">https://www.adulttemp.com/51393/big-clits-big-lips-3-porn-movies.html</a>		
1002 Big Clits Big Lips 5	channel 69, 2003	34	1	14.99	<a href="https://www.adulttemp.com/51393/big-clits-big-lips-3-porn-movies.html">https://www.adulttemp.com/51393/big-clits-big-lips-3-porn-movies.html</a>		
1003 Private Teacher	caballero, 1983	10	1	19.95	<a href="https://www.adulttemp.com/1178454/private-teacher-super-saver-porn-movies.html">https://www.adulttemp.com/1178454/private-teacher-super-saver-porn-movies.html</a>		
1004 Madams Family	xcllement, 1991	14	1	11.19	<a href="https://www.adulttemp.com/1374529/dinner-party-3-cocottes-porn-movies.html">https://www.adulttemp.com/1374529/dinner-party-3-cocottes-porn-movies.html</a>		
1005 Golden Touch	wicked, 1995	34	1	11.19	<a href="https://www.adulttemp.com/542522/golden-touch-the-porn-movies.html">https://www.adulttemp.com/542522/golden-touch-the-porn-movies.html</a>		
1006 Satisfactions	caballero, 1982	9	1	16.99	<a href="https://www.adulttemp.com/1365517/satisfaction-porn-movies.html">https://www.adulttemp.com/1365517/satisfaction-porn-movies.html</a>		
1007 Dinner Party	adam & eve, 1994	74	1	18.99	<a href="https://www.adulttemp.com/1374529/dinner-party-3-cocottes-porn-movies.html">https://www.adulttemp.com/1374529/dinner-party-3-cocottes-porn-movies.html</a>		
1008 My Playing Gauge	digital sin, 2001	69	1	89.99	<a href="https://www.adulttemp.com/1923540/my-playing-gauge-vwd_35978.html">https://www.adulttemp.com/1923540/my-playing-gauge-vwd_35978.html</a>		
1009 Ready to Drop 31	filmo, 2000	16	1	9.99	<a href="https://www.adulttemp.com/1923540/filmo-porn-movies.html?media=2&amp;tr=ready-to-drop">https://www.adulttemp.com/1923540/filmo-porn-movies.html?media=2&amp;tr=ready-to-drop</a>		
1010 Ready to Drop 32	filmo, 2000	12	1	9.99	<a href="https://www.adulttemp.com/1923540/filmo-porn-movies.html?media=2&amp;tr=ready-to-drop">https://www.adulttemp.com/1923540/filmo-porn-movies.html?media=2&amp;tr=ready-to-drop</a>		
1011 Ready to Drop 39	filmo, 2002	34	1	9.99	<a href="https://www.adulttemp.com/1923540/filmo-porn-movies.html?media=2&amp;tr=ready-to-drop">https://www.adulttemp.com/1923540/filmo-porn-movies.html?media=2&amp;tr=ready-to-drop</a>		

	1012 Ready to Drop 41	filmo, 2020	29	1	9.99	<a href="https://www.adultvideomart.com/1925/udf/finco-porn-movies.html?media=2&amp;ty=ready-to-drop">https://www.adultvideomart.com/1925/udf/finco-porn-movies.html?media=2&amp;ty=ready-to-drop</a>
	1013 Amazing Tails 3	caballero, 1987	6	1	69.98	<a href="https://www.adu">https://www.adu</a> increased repurchase costs
K1517.48						
	1014 Stiff Competition	caballero, 1984	8	1	29.95	<a href="https://www.adu">https://www.adu</a> increased repurchase costs
	1015 Debbie Does Dallas 3	vca, 1985	7	1	19.99	<a href="https://www.adultvideomartplace.com/dvd_view_77173.html">https://www.adultvideomartplace.com/dvd_view_77173.html</a>
	1016 Young and Innocent	vca, 1981	14	1	22.88	<a href="https://www.adultvideomartplace.com/dvd_view_40200.html">https://www.adultvideomartplace.com/dvd_view_40200.html</a>
	1017 Trash in The Can	las vegas video, 1983	24	1	36	<a href="http://www.adu">http://www.adu</a> discontinued
	1018 Porn Girls	caballero, 1988	9	1	12.49	<a href="https://www.adultvideomartplace.com/dvd_view_113724.html">https://www.adultvideomartplace.com/dvd_view_113724.html</a>
	1019 Last Condom	cdi, 1988	74	1	0	<a href="https://www.adu">https://www.adu</a> CDI does not have this title listed
	1020 Street Angels	las vegas video, 1992	24	1	36	<a href="http://www.adu">http://www.adu</a> discontinued
	1021 Pillowman	vca, 1988	11	1	27.5	<a href="https://www.adultvideomartplace.com/dvd_view_70254.html">https://www.adultvideomartplace.com/dvd_view_70254.html</a>
	1022 Passages 3	wwd, 1991	34	1	99.98	<a href="https://www.adu">https://www.adu</a> increased repurchase costs
	1023 Immortal Desire	wwd, 1993	32	1	33.95	<a href="https://www.adultvideomartplace.com/dvd_view_33075.html">https://www.adultvideomartplace.com/dvd_view_33075.html</a>
K1801.48						
	1024 Hands Off	plum, 1987	74	1	14.95	<a href="http://www.adultfilmdbase.com/video/16520/hands-off/">http://www.adultfilmdbase.com/video/16520/hands-off/</a>
	1025 Sex Appraisals	filmo, 1990	24	1	0	<a href="https://www.adu">https://www.adu</a> Filmo does not have this title listed
	1026 Babes Illustrated 11	metro, 2001	22.81	1	9.99	<a href="https://www.adultvideomartplace.com/1542/babes-illustrated-11-porn-movies.html">https://www.adultvideomartplace.com/1542/babes-illustrated-11-porn-movies.html</a>
	1027 Pro Ball	video, 1991	11	1	9.95	<a href="https://www.adultvideomartplace.com/dvd_view_103509.html">https://www.adultvideomartplace.com/dvd_view_103509.html</a>
	1028 Dial a Nurse	video, 1992	44	1	39.98	<a href="https://www.adultvideomartplace.com/dvd_view_97955.html">https://www.adultvideomartplace.com/dvd_view_97955.html</a>
	1029 Obsessed	video, 1992	6	1	16.99	<a href="https://www.adultvideomartplace.com/25760/obsessed-porn-movies.html">https://www.adultvideomartplace.com/25760/obsessed-porn-movies.html</a>
	1030 Tight Spot	video, 1992	9	1	11.98	<a href="https://www.adultvideomartplace.com/49926/tight-spot-porn-movies.html">https://www.adultvideomartplace.com/49926/tight-spot-porn-movies.html</a>
	1031 Portrait of an Affair	video, 1988	8	1	29.95	<a href="https://www.adu">https://www.adu</a> increased repurchase costs
	1032 Gimme An X	video, 1993	54	1	49.98	<a href="https://www.adultvideomartplace.com/dvd_view_97948.html">https://www.adultvideomartplace.com/dvd_view_97948.html</a>
	1033 Trouble	video, 1989	8	1	0	<a href="https://www.adu">https://www.adu</a> Video does not have this title listed
	1034 Panties	video, 1993	9	1	14.95	<a href="http://www.adultfilmdbase.com/video/24429/panties/">http://www.adultfilmdbase.com/video/24429/panties/</a>
	1035 Masseuse 2	wwd, 1994	29	1	22	<a href="https://www.adu">https://www.adu</a> stream-download.vod.ms_66358-Masseuse-2/
	1036 No Motive	midnight, 1994	29	1	12	<a href="https://www.leeboo.com/product/2101096-No-Motive/">https://www.leeboo.com/product/2101096-No-Motive/</a>
	1037 Young Nurses in Lust	lbo, 1995	34	1	17	<a href="https://www.leeboo.com/stream-download.vod.ms_22363-Young-Nurses-In-Lust/">https://www.leeboo.com/stream-download.vod.ms_22363-Young-Nurses-In-Lust/</a>
	1038 Peeping Tom	metro, 1986	13	1	0	<a href="https://www.adu">https://www.adu</a> Metro does not have this title listed
K2121.29						
	1039 Fashionistas	disc 1 (evil angel, 2002)	38	1	49.99	<a href="https://www.adu">https://www.adu</a> dvd set
	1040 Fashionistas	disc 2 (evil angel, 2002)	1	1		<a href="https://www.leeboo.com/product/2091983-Fashionistas-Lo&amp;L/">https://www.leeboo.com/product/2091983-Fashionistas-Lo&amp;L/</a>
	1041 Fashionistas	disc 3 (evil angel, 2002)	1	1		<a href="https://www.leeboo.com/product/2091983-Fashionistas-Lo&amp;L/">https://www.leeboo.com/product/2091983-Fashionistas-Lo&amp;L/</a>
	1042 Honeydrippers	rosebud, 1992	34	1	14.99	<a href="https://www.adultvideomartplace.com/51334/honey-drippers-porn-movies.html">https://www.adultvideomartplace.com/51334/honey-drippers-porn-movies.html</a>
	1043 Country Girls In Heat	NA	75	1	36	<a href="https://www.adu">https://www.adu</a> discontinued
	1044 Old Grammes Young Panties 1	heatwave, 2002	24	1	16	<a href="https://www.adultvideomartplace.com/stream-download.vod.ms_14925-Old-Grammes-Young-Panties-2/">https://www.adultvideomartplace.com/stream-download.vod.ms_14925-Old-Grammes-Young-Panties-2/</a>
	1045 Cafe Flesh 3	vca, 2003	9.94	1	14.39	<a href="https://www.adultvideomartplace.com/product/1884587-Miami-Spice-2/">https://www.adultvideomartplace.com/product/1884587-Miami-Spice-2/</a>
	1046 Miami Spice 2	caballero, 1986	7	1	16.15	<a href="https://www.leeboo.com/product/1657010-The-New-Barbarians-2/">https://www.leeboo.com/product/1657010-The-New-Barbarians-2/</a>
	1047 New Barbarians 2	vca, 1990	9.94	1	17.09	<a href="https://www.lee2.separate.prices.added/">https://www.lee2.separate.prices.added/</a>
	1048 Locker 1 and 2	pleasure, 1998, 2000	40.43	1	20.87	<a href="https://www.lee2.separate.prices.added/">https://www.lee2.separate.prices.added/</a>
K2414.6						
	1049 Body'samin' 1 and 3	agv, 1997, 1998	56	1	60.96	<a href="https://www.adu">https://www.adu</a> 2 separate prices added/ <a href="https://www.adultvideomartplace.com/dvd_view_27403.html">https://www.adultvideomartplace.com/dvd_view_27403.html</a>
	1050 Pretty Peaches 2	vca, 1987	9.94	1	16	<a href="https://www.leeboo.com/stream-download.vod.ms_170423-Pretty-Peaches-2/">https://www.leeboo.com/stream-download.vod.ms_170423-Pretty-Peaches-2/</a>
	1051 Anal Misconduct	video, 1995	39	1	39.95	<a href="https://www.adultvideomartplace.com/dvd_view_97957.html">https://www.adultvideomartplace.com/dvd_view_97957.html</a>
	939 Abby Winters 4 pack	disc 1	26	1	24.98	<a href="https://www.adultvideomartplace.com/dvd_view_174527.html">https://www.adultvideomartplace.com/dvd_view_174527.html</a>
	940 Abby Winters 4 pack	disc 2		1		<a href="https://www.adultvideomartplace.com/dvd_view_174527.html">https://www.adultvideomartplace.com/dvd_view_174527.html</a>
	941 Abby Winters 4 pack	disc 3		1		<a href="https://www.adultvideomartplace.com/dvd_view_174527.html">https://www.adultvideomartplace.com/dvd_view_174527.html</a>
	942 Abby Winters 4 pack	disc 4		1		<a href="https://www.adultvideomartplace.com/dvd_view_174527.html">https://www.adultvideomartplace.com/dvd_view_174527.html</a>
	943 Your Mom Tossed My Salad	lethal hardcore, 2009	9	1	9.36	<a href="https://www.leeboo.com/product/1706079-Your-Mom-Tossed-MY-Salad/">https://www.leeboo.com/product/1706079-Your-Mom-Tossed-MY-Salad/</a>
	944 Uranus Experiment	disc 1 (private, 1999)	19	1	27.48	<a href="https://www.leeboo.com/product/1444381-The-Uranus-Experiment/">https://www.leeboo.com/product/1444381-The-Uranus-Experiment/</a>
	945 Uranus Experiment	disc 2 (private, 1999)		1		<a href="https://www.leeboo.com/product/1444381-The-Uranus-Experiment/">https://www.leeboo.com/product/1444381-The-Uranus-Experiment/</a>
	946 Uranus Experiment	disc 3 (private, 1999)		1		<a href="https://www.leeboo.com/product/1444381-The-Uranus-Experiment/">https://www.leeboo.com/product/1444381-The-Uranus-Experiment/</a>
	947 Uranus Experiment	disc 4 (private, 1999)		1		<a href="https://www.lee2.separate.prices.added/">https://www.lee2.separate.prices.added/</a>
	948 Taboo American Style 1	vca, 1985	29	1	16.95	<a href="https://www.lee2.separate.prices.added/">https://www.lee2.separate.prices.added/</a>

949 Taboo American Style 2	vca, 1985	1	14.95	<a href="https://www.jeeboo.com/product/1532863-Taboo-American-Style-2/">https://www.jeeboo.com/product/1532863-Taboo-American-Style-2/</a>	
950 Taboo American Style 3	vca, 1985	1	35.36	<a href="https://www.jeeboo.com/product/1532862-Taboo-American-Style-3/">https://www.jeeboo.com/product/1532862-Taboo-American-Style-3/</a>	
<b>k2547.54</b>					
951 Taboo American Style 4	vca, 1985	1	16.95	<a href="https://www.jeeboo.com/stream/download/vod_mns_89579-Taboo-American-Style-Part-4-The-Exciting-Conclude">https://www.jeeboo.com/stream/download/vod_mns_89579-Taboo-American-Style-Part-4-The-Exciting-Conclude</a>	
952 Big Wet Asses 15	elegant angel, 2009	14	13.22	<a href="https://www.jeeboo.com/product/1690298-Big-Wet-Asses-15/">https://www.jeeboo.com/product/1690298-Big-Wet-Asses-15/</a>	
953 Asian Chunky Chicks	channel 69, 1999	10	16.95	<a href="https://www.jeeboo.com/stream/download/vod_mns_14457-Asian-Chunky-Chicks/">https://www.jeeboo.com/stream/download/vod_mns_14457-Asian-Chunky-Chicks/</a>	
954 Sex City	disc 1 (private gold, 2006)	13	8.71	<a href="https://www.jeeboo.com/product/2078024-Sex-City-1/">https://www.jeeboo.com/product/2078024-Sex-City-1/</a>	
955 Sex City	disc 2 (private gold, 2006)	1	24.11	<a href="https://www.jeeboo.com/stream/download/vod_mns_79556-Sex-City-3/">https://www.jeeboo.com/stream/download/vod_mns_79556-Sex-City-3/</a>	
956 Cheerleaders	disc 1 (digital playground, 2008)	18	15.95	<a href="https://www.jeeboo.com/stream/download/vod_mns_288794-Cheerleaders/">https://www.jeeboo.com/stream/download/vod_mns_288794-Cheerleaders/</a>	
957 Cheerleaders	disc 2 (digital playground, 2008)	1		<a href="https://www.jeeboo.com/stream/download/vod_mns_288794-Cheerleaders/">https://www.jeeboo.com/stream/download/vod_mns_288794-Cheerleaders/</a>	
913 Granny's Gone Anal	disc 1 (filmco, 2004)	100	36	<a href="https://www.jeeboo.com/stream/download/vod_mns_60326-Granny's-Gone-Anal-2/">https://www.jeeboo.com/stream/download/vod_mns_60326-Granny's-Gone-Anal-2/</a>	
914 Granny's Gone Anal	disc 2	1	18	<a href="https://www.jeeboo.com/stream/download/vod_mns_60326-Granny's-Gone-Anal-2/">https://www.jeeboo.com/stream/download/vod_mns_60326-Granny's-Gone-Anal-2/</a>	
915 Granny's Gone Anal	disc 3	1	18	<a href="https://www.jeeboo.com/stream/download/vod_mns_60326-Granny's-Gone-Anal-2/">https://www.jeeboo.com/stream/download/vod_mns_60326-Granny's-Gone-Anal-2/</a>	
916 Granny's Gone Anal	disc 4	1	18	<a href="https://www.jeeboo.com/stream/download/vod_mns_60326-Granny's-Gone-Anal-2/">https://www.jeeboo.com/stream/download/vod_mns_60326-Granny's-Gone-Anal-2/</a>	
917 Granny's Gone Anal	disc 5	1	18	<a href="https://www.jeeboo.com/stream/download/vod_mns_60326-Granny's-Gone-Anal-2/">https://www.jeeboo.com/stream/download/vod_mns_60326-Granny's-Gone-Anal-2/</a>	
918 Granny's Gone Anal	disc 6	1	18	<a href="https://www.jeeboo.com/stream/download/vod_mns_60326-Granny's-Gone-Anal-2/">https://www.jeeboo.com/stream/download/vod_mns_60326-Granny's-Gone-Anal-2/</a>	
<b>k2757.54</b>					
884 Mother Daughter Exchange Club 2	girlfriend, 2008	12	23	<a href="https://www.adultvtemple.com/1441346-mother-daughter-exchange-club-part-2-porn-movies.html">https://www.adultvtemple.com/1441346-mother-daughter-exchange-club-part-2-porn-movies.html</a>	
885 DVD A	ovex, 2003	64	36	<a href="https://www.adultvtemple.com/1646289/ovexs-world-fet-cosession-2-porn-movies.html">https://www.adultvtemple.com/1646289/ovexs-world-fet-cosession-2-porn-movies.html</a>	
886 Obsession 2	disc set (evil angel, 2006)	24	20	<a href="https://www.adultvtemple.com/1646289/ovexs-world-fet-cosession-2-porn-movies.html">https://www.adultvtemple.com/1646289/ovexs-world-fet-cosession-2-porn-movies.html</a>	
887 Older Women, Younger Women 8	coast to coast, 2007	13	16.95	<a href="https://www.jeeboo.com/stream/download/vod_mns_96829-Older-Women-Younger-Women-8/">https://www.jeeboo.com/stream/download/vod_mns_96829-Older-Women-Younger-Women-8/</a>	
888 Shot at Home 4	shot at home, 2008	22	17.95	<a href="https://www.jeeboo.com/product/1701876-Shot-At-Home-5/">https://www.jeeboo.com/product/1701876-Shot-At-Home-5/</a>	
889 Obscene Behavior 5	red light district, 2008	10	11.47	<a href="https://www.jeeboo.com/product/1704017-Obscene-Behavior-5/">https://www.jeeboo.com/product/1704017-Obscene-Behavior-5/</a>	
890 Art of Kissing	vv tmas, 2003	24	25	<a href="https://www.jeeboo.com/stream/download/vod_mns_110592-The-Art-Of-Kissing/">https://www.jeeboo.com/stream/download/vod_mns_110592-The-Art-Of-Kissing/</a>	
891 Jack's P.O.V.13	digital playground, 2009	39	16	<a href="https://www.jeeboo.com/stream/download/vod_mns_308016-Jacks-P.O.V-13/">https://www.jeeboo.com/stream/download/vod_mns_308016-Jacks-P.O.V-13/</a>	
892 Cherries 56	homegrow, 2007	9	18	<a href="https://www.jeeboo.com/stream/download/vod_mns_97801-Cherries-56/">https://www.jeeboo.com/stream/download/vod_mns_97801-Cherries-56/</a>	
893 Dear Fanny	metro, 1985	34	22.99	<a href="https://www.adultvtemple.com/1446533/dear-fanny-porn-movies.html">https://www.adultvtemple.com/1446533/dear-fanny-porn-movies.html</a>	
894 Corruption	disc 1 (sex z, 2006, directors cut w/isting)	100	36	<a href="https://www.adultvtemple.com/1222949/corruption-porn-movies.html">https://www.adultvtemple.com/1222949/corruption-porn-movies.html</a>	
895 Corruption	disc 2	1		<a href="https://www.adultvtemple.com/1222949/corruption-porn-movies.html">https://www.adultvtemple.com/1222949/corruption-porn-movies.html</a>	
896 Corruption	disc 3	1		<a href="https://www.adultvtemple.com/1222949/corruption-porn-movies.html">https://www.adultvtemple.com/1222949/corruption-porn-movies.html</a>	
880 Panochilas Gordias 1	channel 69, 1999	15.34	16.95	<a href="https://www.jeeboo.com/stream/download/vod_mns_13781-Panochilas-Gordias-1-Chunky-Latinas/">https://www.jeeboo.com/stream/download/vod_mns_13781-Panochilas-Gordias-1-Chunky-Latinas/</a>	
881 Panochilas Gordias 2	channel 69, 2000	15.34	16.95	<a href="https://www.jeeboo.com/stream/download/vod_mns_13781-Panochilas-Gordias-1-Chunky-Latinas/">https://www.jeeboo.com/stream/download/vod_mns_13781-Panochilas-Gordias-1-Chunky-Latinas/</a>	
882 Panochilas Gordias 3	channel 69, 2000	18.18	16.95	<a href="https://www.jeeboo.com/stream/download/vod_mns_13781-Panochilas-Gordias-1-Chunky-Latinas/">https://www.jeeboo.com/stream/download/vod_mns_13781-Panochilas-Gordias-1-Chunky-Latinas/</a>	
873 Mask	wild, 1993	21	24	<a href="https://www.jeeboo.com/stream/download/vod_mns_78324-Mask/">https://www.jeeboo.com/stream/download/vod_mns_78324-Mask/</a>	
870 Fucking at 50 (4)	healwave, 2002	17	33	<a href="https://www.jeeboo.com/product/1924979-Fucking-At-50-4/">https://www.jeeboo.com/product/1924979-Fucking-At-50-4/</a>	
871 Big Bad Grannies	metropolis, 2000	100	18	<a href="https://www.jeeboo.com/stream/download/vod_mns_41930-Big-Bad-Grannies/">https://www.jeeboo.com/stream/download/vod_mns_41930-Big-Bad-Grannies/</a>	
862 Double Pleasures	plush, 1995	17	27	<a href="https://www.jeeboo.com/stream/download/vod_mns_41930-Big-Bad-Grannies/">https://www.jeeboo.com/stream/download/vod_mns_41930-Big-Bad-Grannies/</a>	
863 Big Love	plush, 1997	1	36	<a href="https://www.adultvtemple.com/1909615-Double-Pleasures/">https://www.adultvtemple.com/1909615-Double-Pleasures/</a>	
831 American Girl	wild (no date)	8	36	<a href="https://www.adultvtemple.com/1909615-Double-Pleasures/">https://www.adultvtemple.com/1909615-Double-Pleasures/</a>	
811 Allright	metro, 1998	34	9.58	<a href="https://www.jeeboo.com/product/518279-Allright-8/">https://www.jeeboo.com/product/518279-Allright-8/</a>	
745 Xcalibur 3	disc 1 (nim work, 2007)	27	50.9	<a href="https://www.jeeboo.com/product/1616667-Xcalibur-Episode-3-The-Lords-of-Sex/">https://www.jeeboo.com/product/1616667-Xcalibur-Episode-3-The-Lords-of-Sex/</a>	
746 Xcalibur 3	disc 2 (nim work, 2007)	1			
<b>k=3435.4</b>					
701 Nightshift Nurses	vca, 1987	9.94	15.99	<a href="https://www.adultvtemple.com/122171nightshiftnurses-porn-movies.html">https://www.adultvtemple.com/122171nightshiftnurses-porn-movies.html</a>	
702 Bad Wives 2	wild, 2001	9.94	24.95	<a href="https://www.jeeboo.com/stream/download/vod_mns_6433-Bad-Wives-2/">https://www.jeeboo.com/stream/download/vod_mns_6433-Bad-Wives-2/</a>	
703 Hot Spa	caballero, 1984	9.94	18	<a href="https://www.jeeboo.com/stream/download/vod_mns_37625-Hot-Spa/">https://www.jeeboo.com/stream/download/vod_mns_37625-Hot-Spa/</a>	
704 Lisa	sin city, 1997	14	18	<a href="https://www.jeeboo.com/stream/download/vod_mns_89836-Lisa/">https://www.jeeboo.com/stream/download/vod_mns_89836-Lisa/</a>	
705 If My Mother Only Knew	caballero, 1985	12	8	<a href="https://www.adultvtemple.com/64706-if-my-mother-only-knew-view_53943.html">https://www.adultvtemple.com/64706-if-my-mother-only-knew-view_53943.html</a>	
706 Wild Dallas Honey	caballero, 1982	34	69.99	<a href="https://www.adultvtemple.com/64706-if-my-mother-only-knew-view_53943.html">https://www.adultvtemple.com/64706-if-my-mother-only-knew-view_53943.html</a>	
707 Granny Anal Queens 2	filmco, 2005	49	7.99	<a href="https://www.adultvtemple.com/64706-if-my-mother-only-knew-view_53943.html">https://www.adultvtemple.com/64706-if-my-mother-only-knew-view_53943.html</a>	
708 Never Sleep Alone	caballero, 1984	39	19.85	<a href="https://www.adultvtemple.com/64706-if-my-mother-only-knew-view_53943.html">https://www.adultvtemple.com/64706-if-my-mother-only-knew-view_53943.html</a>	
709 I Want to Be Bad	metro, 1984	16	58	<a href="https://www.adultvtemple.com/64706-if-my-mother-only-knew-view_53943.html">https://www.adultvtemple.com/64706-if-my-mother-only-knew-view_53943.html</a>	
710 Winkers 2	sinplex, 2004	1	66	<a href="https://www.jeeboo.com/product/147042-Winkers-6/">https://www.jeeboo.com/product/147042-Winkers-6/</a>	
711 Strip on Mill Fs	xtraordinary, 2005	11	11.99	<a href="https://www.adultvtemple.com/893248-strip-on-mill-fs-sex%20world%202002">https://www.adultvtemple.com/893248-strip-on-mill-fs-sex%20world%202002</a>	
712 Mature Kirk Ory 3	xtraordinary, 2005	8	18	<a href="https://www.jeeboo.com/stream/download/vod_mns_42152-Mature-Kirk-Ory-3/">https://www.jeeboo.com/stream/download/vod_mns_42152-Mature-Kirk-Ory-3/</a>	
713 Body Builders in Heat 6	channel 69, 2000	14	18	<a href="https://www.jeeboo.com/stream/download/vod_mns_35793-Body-Builders-in-Heat-6/">https://www.jeeboo.com/stream/download/vod_mns_35793-Body-Builders-in-Heat-6/</a>	



K5107.68	672 Secret Passions	caballero, 1979	7	1		9.96	<a href="https://www.hotmovies.com/video/145592/Josefine-Mutzenbacher-Hans-Der-Geheimnis-Luste-German-Fremde">https://www.hotmovies.com/video/145592/Josefine-Mutzenbacher-Hans-Der-Geheimnis-Luste-German-Fremde</a>	
	673 Bi Sex	4pack		1		14.96	<a href="https://www.jac.com/Best-of-seems-to-be-missing-from-this-item">https://www.jac.com/Best-of-seems-to-be-missing-from-this-item</a>	
	674 Too Naughty to Say No	caballero, 1984	64	1		19	<a href="http://www.adultfilmdatabase.com/video/32775/Too-naughty-to-say-no">http://www.adultfilmdatabase.com/video/32775/Too-naughty-to-say-no</a>	
	675 Neon Nights	disc 1 (command, 1981)	29	1		33.33	<a href="https://www.adultfilmdatabase.com/video/adult_dvd/dvd_view.php?adult_dvd_id=101279&amp;partner=afid">https://www.adultfilmdatabase.com/video/adult_dvd/dvd_view.php?adult_dvd_id=101279&amp;partner=afid</a>	
	676 Neon Nights	disc 2 (command, 1981)		1			<a href="https://www.pornhub.com/view_video.php?viewkey=9b5dd10b95b1a">https://www.pornhub.com/view_video.php?viewkey=9b5dd10b95b1a</a>	
	677 D: Vine Luv	disc 1	73	1		36	<a href="https://www.adf.no/sales-listed-online">https://www.adf.no/sales-listed-online</a>	
	678 D: Vine Luv	disc 2		1			<a href="https://www.adultfilmdatabase.com/dvd_view_73329.html">https://www.adultfilmdatabase.com/dvd_view_73329.html</a>	
	679 D: Vine Luv	disc 3 & 4		1			<a href="https://www.adultfilmdatabase.com/dvd_view_73330.html">https://www.adultfilmdatabase.com/dvd_view_73330.html</a>	
	680 Stepmother's Sin	NA	54	1		14.96	<a href="https://www.alchornia.com/magazine/sex/article/184074/">https://www.alchornia.com/magazine/sex/article/184074/</a>	
	681 8 to 4	caballero, 1981	9	1		9.99	<a href="https://www.adultfilmdatabase.com/video/1491453/8-to-4-porn-videos.html">https://www.adultfilmdatabase.com/video/1491453/8-to-4-porn-videos.html</a>	
K5592.68	682 L.A. Fashion Girls	vca, 1998	19	1		11.99	<a href="https://www.adultfilmdatabase.com/878702/lis-fashion-girls-porn-videos.html">https://www.adultfilmdatabase.com/878702/lis-fashion-girls-porn-videos.html</a>	
	683 Pizza Girls	vca, 1978	14	1		18.99	<a href="https://www.adultfilmdatabase.com/1790018/hot-stacy-pizza-girls-porn-videos.html">https://www.adultfilmdatabase.com/1790018/hot-stacy-pizza-girls-porn-videos.html</a>	
	659 Face Fucked	wildlife, 1998	19	1				
	660 Dirty Western	arrow, 1975	14	1				
	661 Air Bags 2	channel 69, 1999	14	1				
	662 Loose Lifestyles	caballero, 1987	8	1		9.99		
	663 Open Nightly	caballero, 1980	17	1				
	664 Latex	vca, 1995	10	1				
	665 Pleasure Game	caballero, 1987	9	1				
	666 Dirty Girls	vca, 1984	29	1				
K5107.68	667 Center-spread Girls	caballero, 1982	9	1				
	668 Secret Urges	video, 1994	8	1				
	669 Little Miss Curious	caballero, 1991	9	1				
	670 Mini	caballero, 1987	7	1				
	671 Desperate Women	video, 1985	8	1				
K5107.68	672 Secret Passions	caballero, 1979	7	1				
	673 Bi Sex 4 Pack	NA		1				
	674 Too Naughty to Say No	caballero, 1984	64	1				
	675 Neon Nights	disc 1 (command, 1981)	29	1				
	676 Neon Nights	disc 2 (command, 1981)		1				
	677 D: Vine Luv	disc 1	73	1				
	678 D: Vine Luv	disc 2		1				
	679 D: Vine Luv	disc 3 & 4		2				
	680 Stepmother's Sin	caballero, 1981	54	1				
	681 8 to 4	vca, 1988	19	1				
K5592.68	682 L.A. Fashion Girls	vca, 1988	19	1				
	683 Pizza Girls	vca, 1978	14	1				
K5592.68	684 Dream Girls	vca, 1987	16	1		15.99	<a href="http://www.adultfilmdatabase.com/video/12159/dream-girls/">http://www.adultfilmdatabase.com/video/12159/dream-girls/</a>	
	685 Amanda By Night	caballero, 1981	14	1		22	<a href="https://www.adultfilmdatabase.com/dvd_view_31785.html">https://www.adultfilmdatabase.com/dvd_view_31785.html</a>	
	686 Red Vibe Daries	metro, 1997	10	1		19.45	<a href="https://www.adultfilmdatabase.com/dvd_view_153968.html">https://www.adultfilmdatabase.com/dvd_view_153968.html</a>	
	687 Femmes On Fire	vca, 1990	6	1		4.24	<a href="https://www.adultfilmdatabase.com/dvd_view_107205.html">https://www.adultfilmdatabase.com/dvd_view_107205.html</a>	
	688 Electric Sex	new sensations, 1999	18	1		14.96	<a href="http://www.adultfilmdatabase.com/video/12546/electric-sex/">http://www.adultfilmdatabase.com/video/12546/electric-sex/</a>	
	689 Stacy Valentine 4 on 1	vca	32	1		18	<a href="https://www.adultfilmdatabase.com/video/12546/electric-sex/">https://www.adultfilmdatabase.com/video/12546/electric-sex/</a>	
	690 Slightly Used	vidco, 1987	7	1		12.74	<a href="https://www.adultfilmdatabase.com/1123392/slightly-used-porn-movies.html">https://www.adultfilmdatabase.com/1123392/slightly-used-porn-movies.html</a>	
	691 Big Game	elegant angel, 1997	8	1		11.99	<a href="https://www.adultfilmdatabase.com/18731/dbe-game-porn-movies.html">https://www.adultfilmdatabase.com/18731/dbe-game-porn-movies.html</a>	
	692 Seven Deadly Sins	wild, 1999	18	1		11.24	<a href="https://www.adultfilmdatabase.com/8365/seven-deadly-sins-porn-movies.html">https://www.adultfilmdatabase.com/8365/seven-deadly-sins-porn-movies.html</a>	
	693 Hell on Heels	wicked, 1999	8	1		30	<a href="https://www.icebox.com/stream-download/dvd_rns_17473-Hell-On-Heels/">https://www.icebox.com/stream-download/dvd_rns_17473-Hell-On-Heels/</a>	
K5592.68	694 Bat	wild, 1986	39	1		24	<a href="https://www.icebox.com/stream-download/dvd_rns_74638-The-Bat/">https://www.icebox.com/stream-download/dvd_rns_74638-The-Bat/</a>	
	695 Dog Walker	john leslie, 1994	27	1		21	<a href="https://www.icebox.com/stream-download/dvd_rns_100618-john-lestie-dog-walker/">https://www.icebox.com/stream-download/dvd_rns_100618-john-lestie-dog-walker/</a>	
	550 Fudburgers	legend, 1987	13	1		1.96	<a href="https://www.adultfilmdatabase.com/video/adult_dvd/dvd_view.php?adult_dvd_id=33250&amp;partner=afid">https://www.adultfilmdatabase.com/video/adult_dvd/dvd_view.php?adult_dvd_id=33250&amp;partner=afid</a>	







49 Goin Deep	NA	29	1	14.99	0	<a href="https://www.ja3d.com/title.rme?title=goin+deep&amp;year=1999">https://www.ja3d.com/title.rme?title=goin+deep&amp;year=1999</a>	goin-deep.htm
50 Matt Diers Delights	NA	100	1	14.99	0	<a href="https://www.ja3d.com/title.rme?title=matt+diers+delights&amp;year=1995">https://www.ja3d.com/title.rme?title=matt+diers+delights&amp;year=1995</a>	elegant-bargain.htm
51 Elegant Bargain	bat dogs, 1995	18	1	14.24	18	<a href="https://www.ja3d.com/title.rme?title=elegant-bargain&amp;year=1995">https://www.ja3d.com/title.rme?title=elegant-bargain&amp;year=1995</a>	elegant-bargain.htm
52 Nineteen 27	dane, 1999	64	1	29.95	20	<a href="https://www.adultvideoarchive.com/2616063/nineteen-video-magazine-27-porn-videos.html">https://www.adultvideoarchive.com/2616063/nineteen-video-magazine-27-porn-videos.html</a>	
53 In My Box	erotic angel, 2001	34	1	14.95	10	<a href="https://www.ja3d.com/title.rme?title=in+my+box&amp;year=1991">https://www.ja3d.com/title.rme?title=in+my+box&amp;year=1991</a>	killer-looks.htm
54 Sex Merchants	dreamland, 2001	100	1	14.95	10	<a href="https://www.ja3d.com/title.rme?title=sex+merchants&amp;year=2001">https://www.ja3d.com/title.rme?title=sex+merchants&amp;year=2001</a>	sex-merchants.htm
55 Lover's Trance	legend, 1990	18	1	14.94	18	<a href="https://www.ja3d.com/title.rme?title=lovers+trance&amp;year=1990">https://www.ja3d.com/title.rme?title=lovers+trance&amp;year=1990</a>	lover&apos;s-trance.htm
56 Magic Touch	cal vista, 1985	13	1	14.94	18	<a href="https://www.ja3d.com/title.rme?title=magic+touch&amp;year=1985">https://www.ja3d.com/title.rme?title=magic+touch&amp;year=1985</a>	magic-touch.htm
k-8866.9							
57 Roadside Slut 7		100	1	36	0	<a href="http://www.adult.com/title.rme?title=roadside-slut-7&amp;year=1991">http://www.adult.com/title.rme?title=roadside-slut-7&amp;year=1991</a>	killer-looks.htm
58 Up The Wabzoo	coast to coast, 2001	12	1	7.99	0	<a href="https://www.ja3d.com/title.rme?title=up+the+wabzoo+1&amp;year=2001">https://www.ja3d.com/title.rme?title=up+the+wabzoo+1&amp;year=2001</a>	up-the-wabzoo-1.htm
59 COH Camp	video age4/ hours of seka	100	1	19.95	0	<a href="https://www.ja3d.com/title.rme?title=coh-camp&amp;year=1991">https://www.ja3d.com/title.rme?title=coh-camp&amp;year=1991</a>	killer-looks.htm
60 Killer Looks	vidd, 1991	26	1	14.95	10	<a href="https://www.hotmovies.com/video/108444/Friday-The-13th-A-Nude-Beginning#">https://www.hotmovies.com/video/108444/Friday-The-13th-A-Nude-Beginning#</a>	
61 Friday the 13th A Nude Beginning	vidco, 1987	10	1	36	0	<a href="https://www.hotmovies.com/video/154277/The-Good-Girls-Of-Godiva-High">https://www.hotmovies.com/video/154277/The-Good-Girls-Of-Godiva-High</a>	
62 Les Interdits	NA	50	1	26.24	18	<a href="https://www.porn.com/porn/6521870/possessions-porn-dvd.htm?partner_id=94387233&amp;utm_source=IAET&amp;utm_medium=video&amp;utm_campaign=2021">https://www.porn.com/porn/6521870/possessions-porn-dvd.htm?partner_id=94387233&amp;utm_source=IAET&amp;utm_medium=video&amp;utm_campaign=2021</a>	
63 Good Girls of Godiva High	vca, 1997	12.95	1	22.99	0	<a href="https://www.ja3d.com/title.rme?title=good-girls-of-godiva-high&amp;year=1997">https://www.ja3d.com/title.rme?title=good-girls-of-godiva-high&amp;year=1997</a>	good-girls-of-godiva-high.htm
64 Possessions (Blake)	studio a, 1997	18	1	22.99	0	<a href="https://www.ja3d.com/title.rme?title=possessions&amp;year=1997">https://www.ja3d.com/title.rme?title=possessions&amp;year=1997</a>	possessions.htm
65 Black Silk Stockings	select a tape, 1979	18	1	22.99	0	<a href="https://www.ja3d.com/title.rme?title=black-silk-stockings&amp;year=1979">https://www.ja3d.com/title.rme?title=black-silk-stockings&amp;year=1979</a>	black-silk-stockings.htm
66 Can't Get Enough Dog	NA	50	1	20	0	<a href="https://www.ja3d.com/title.rme?title=can-t-get-enough-dog&amp;year=1987">https://www.ja3d.com/title.rme?title=can-t-get-enough-dog&amp;year=1987</a>	lonesome-ladies-1.htm
67 Lonesome Ladies 1	matlowe sales, 1987	100	1	36	0	<a href="https://www.ja3d.com/title.rme?title=lonesome-ladies-1&amp;year=1987">https://www.ja3d.com/title.rme?title=lonesome-ladies-1&amp;year=1987</a>	lonesome-ladies-1.htm
68 Tracy I Love You	caballero, 1987	17	1	36	0	<a href="https://www.ja3d.com/title.rme?title=tracy-i-love-you&amp;year=1987">https://www.ja3d.com/title.rme?title=tracy-i-love-you&amp;year=1987</a>	tracy-i-love-you.htm
69 Some Kind Of Woman	caballero, 1985	10	1	36	0	<a href="https://www.ja3d.com/title.rme?title=some-kind-of-woman&amp;year=1985">https://www.ja3d.com/title.rme?title=some-kind-of-woman&amp;year=1985</a>	some-kind-of-woman.htm
70 Forbidden Farrah	dreamland/k-beech, 2000	19	1	36	0	<a href="https://www.mnc.no/online-sales">https://www.mnc.no/online-sales</a>	no online sales
k8210.85							
71 Bashful Blonde	NA	11	1	39.98	0	<a href="https://www.ja3d.com/title.rme?title=bashful-blonde&amp;year=1993">https://www.ja3d.com/title.rme?title=bashful-blonde&amp;year=1993</a>	bashful-blonde.htm
72 Tight Places	NA	20	1	15.99	0	<a href="https://www.ja3d.com/title.rme?title=tight+places&amp;year=2000">https://www.ja3d.com/title.rme?title=tight+places&amp;year=2000</a>	tight-places.htm
73 Ret's	plum, 1987	20	1	25	0	<a href="https://www.adultvideoarchive.com/xcart/dvdl_dvd/dvd_view.php?redit_dvd_id=37080&amp;partner=ja3d">https://www.adultvideoarchive.com/xcart/dvdl_dvd/dvd_view.php?redit_dvd_id=37080&amp;partner=ja3d</a>	
74 Natural Asses	NA	100	1	0	0	<a href="https://www.ja3d.com/title.rme?title=natural-asses&amp;year=1992">https://www.ja3d.com/title.rme?title=natural-asses&amp;year=1992</a>	natural-asses.htm
75 Shame	vidd, 1994	20	1	24	36	<a href="https://www.ja3d.com/title.rme?title=shame&amp;year=1994">https://www.ja3d.com/title.rme?title=shame&amp;year=1994</a>	shame.htm
76 Clive	NA	20	1	74	0	<a href="https://www.ja3d.com/title.rme?title=clive&amp;year=1988">https://www.ja3d.com/title.rme?title=clive&amp;year=1988</a>	clive.htm
77 California Cockstuckers	sin city, 1998	74	1	19.97	0	<a href="https://www.ja3d.com/title.rme?title=california-cockstuckers&amp;year=1998">https://www.ja3d.com/title.rme?title=california-cockstuckers&amp;year=1998</a>	california-cockstuckers.htm
78 Knocked Up Nymphs	blue demon, 2006	7	1	12.98	0	<a href="https://www.adultvideoarchive.com/dvdl_view_112413.html">https://www.adultvideoarchive.com/dvdl_view_112413.html</a>	
79 Hot Nights and Dirty Days	vidco, 1988	25	1	36	0	<a href="https://www.adultvideoarchive.com/220755/hot-nights-dirty-days-porn-movies.htm?partner_id=94387233&amp;utm_source=IAET&amp;utm_medium=video&amp;utm_campaign=2021">https://www.adultvideoarchive.com/220755/hot-nights-dirty-days-porn-movies.htm?partner_id=94387233&amp;utm_source=IAET&amp;utm_medium=video&amp;utm_campaign=2021</a>	
80 Fuck My Ass Please 8	NA	100	1	14.95	10	<a href="http://www.adult.com/These+are+compilations+and+each+title+will+likely+be+similar+in+value+in+a+series+discontinued">http://www.adult.com/These+are+compilations+and+each+title+will+likely+be+similar+in+value+in+a+series+discontinued</a>	
81 Between Her Thighs	cdi, 1992	100	1	11.19	0	<a href="https://www.hotmovies.com/video/108683/Between-Her-Thighs-7&amp;mp3&amp;mp3_380d_domain=hotmovies.com">https://www.hotmovies.com/video/108683/Between-Her-Thighs-7&amp;mp3&amp;mp3_380d_domain=hotmovies.com</a>	
82 Scurly Sex Kittens 1	vca, 1993	20	1	20	0	<a href="https://www.porn.com/porn/11234/scurly-sex-kittens-1-porn-dvd.htm?partner_id=94387233&amp;utm_source=IAET&amp;utm_medium=video&amp;utm_campaign=2021">https://www.porn.com/porn/11234/scurly-sex-kittens-1-porn-dvd.htm?partner_id=94387233&amp;utm_source=IAET&amp;utm_medium=video&amp;utm_campaign=2021</a>	
83 Hills Have Thighs	midnight, 1992	100	1	20	0	<a href="https://www.ja3d.com/title.rme?title=hills-have-thighs&amp;year=1992">https://www.ja3d.com/title.rme?title=hills-have-thighs&amp;year=1992</a>	hills-have-thighs.htm
84 Big Bad Grannies	NA	100	1	20	0	<a href="https://www.ja3d.com/title.rme?title=big-bad-grannies&amp;year=1992">https://www.ja3d.com/title.rme?title=big-bad-grannies&amp;year=1992</a>	big-bad-grannies.htm
85 Only With A Married Woman	legend, 1990	100	1	20	0	<a href="https://www.ja3d.com/title.rme?title=only-with-a-married-woman&amp;year=1990">https://www.ja3d.com/title.rme?title=only-with-a-married-woman&amp;year=1990</a>	only-with-a-married-woman.htm
86 Route 69	erotic angel, 1998	10	1	10	0	<a href="https://www.ja3d.com/title.rme?title=route-69&amp;year=1998">https://www.ja3d.com/title.rme?title=route-69&amp;year=1998</a>	route-69.htm
87 Phoenix 2	vidd, 1992	30	1	14.99	0	<a href="https://www.ja3d.com/title.rme?title=phoenix-2&amp;year=1992">https://www.ja3d.com/title.rme?title=phoenix-2&amp;year=1992</a>	phoenix-2.htm
88 Bedeviled	dreamland, 2000	5	1	18.99	0	<a href="https://www.ja3d.com/title.rme?title=bedeviled&amp;year=2000">https://www.ja3d.com/title.rme?title=bedeviled&amp;year=2000</a>	bedeviled.htm
89 Pleasure Seekers	dreamland, 2002	14	1	19.99	0	<a href="https://www.ja3d.com/title.rme?title=pleasure-seekers&amp;year=2002">https://www.ja3d.com/title.rme?title=pleasure-seekers&amp;year=2002</a>	pleasure-seekers.htm
90 All of Me	NA	64	1	69.99	0	<a href="https://www.ja3d.com/title.rme?title=all-of-me&amp;year=2002">https://www.ja3d.com/title.rme?title=all-of-me&amp;year=2002</a>	all-of-me.htm
91 Shay's Sweet Shop	dreamland, 2001	24	1	20	0	<a href="https://www.ja3d.com/title.rme?title=shay-s-sweet-shop&amp;year=2001">https://www.ja3d.com/title.rme?title=shay-s-sweet-shop&amp;year=2001</a>	shay&apos;s-sweet-shop.htm
92 Operation: Centerfold	notorious, 1999	100	1	14.99	0	<a href="https://www.ja3d.com/title.rme?title=operation-3a-centerfold&amp;year=1999">https://www.ja3d.com/title.rme?title=operation-3a-centerfold&amp;year=1999</a>	operation-centerfold.htm
93 Dumb Blonde	vidd, 2002	20	1	10.79	0	<a href="https://www.ja3d.com/title.rme?title=dumb-blonde&amp;year=2002">https://www.ja3d.com/title.rme?title=dumb-blonde&amp;year=2002</a>	dumb-blonde.htm
94 Couch Therapy	dreamland	19	1	36	0	<a href="https://www.ja3d.com/title.rme?title=couch-therapy&amp;year=1999">https://www.ja3d.com/title.rme?title=couch-therapy&amp;year=1999</a>	couch-therapy.htm
95 Best of Alicia Monet 1	we1, 2002	100	1	20	0	<a href="https://www.adult.com/title.rme?title=best-of-alicia-monet-1&amp;year=2002">https://www.adult.com/title.rme?title=best-of-alicia-monet-1&amp;year=2002</a>	best-of-alicia-monet-1.htm
96 Best of International Lesbian Affair 2	bat dog	100	1	20	0	<a href="https://www.ja3d.com/title.rme?title=best-of-international-lesbian-affair-2&amp;year=1990">https://www.ja3d.com/title.rme?title=best-of-international-lesbian-affair-2&amp;year=1990</a>	best-of-international-lesbian-affair-2.htm
97 Sex and The Single Girl	CDI	100	1	20	0	<a href="https://www.ja3d.com/title.rme?title=sex-and-the-single-girl&amp;year=1990">https://www.ja3d.com/title.rme?title=sex-and-the-single-girl&amp;year=1990</a>	sex-and-the-single-girl.htm
98 Hard for Lard	NA	16	1	0	0	<a href="https://www.ja3d.com/title.rme?title=hard-for-lard&amp;year=1992">https://www.ja3d.com/title.rme?title=hard-for-lard&amp;year=1992</a>	hard-for-lard.htm
99 Mummy 3	las vegas video, 1992	13	1	13	0	<a href="https://www.ja3d.com/title.rme?title=mummy-3&amp;year=1992">https://www.ja3d.com/title.rme?title=mummy-3&amp;year=1992</a>	mummy-3.htm
100 Miss Orgasma	k-beech, 2001	44	1	15	0	<a href="https://www.ja3d.com/title.rme?title=miss-orgasma&amp;year=2001">https://www.ja3d.com/title.rme?title=miss-orgasma&amp;year=2001</a>	miss-orgasma.htm
101 Lunar Lust	filmco, 1990	40	1	10	0	<a href="https://www.ja3d.com/title.rme?title=lunar-lust&amp;year=1990">https://www.ja3d.com/title.rme?title=lunar-lust&amp;year=1990</a>	lunar-lust.htm
102 Hard to Thrill	cdi, 1991	11	1	11	0	<a href="https://www.ja3d.com/title.rme?title=hard-to-thrill&amp;year=1991">https://www.ja3d.com/title.rme?title=hard-to-thrill&amp;year=1991</a>	hard-to-thrill.htm
103 Taboo 16	metro, 1996	13	1	14.99	0	<a href="https://www.ja3d.com/title.rme?title=taboo-16&amp;year=1996">https://www.ja3d.com/title.rme?title=taboo-16&amp;year=1996</a>	taboo-16.htm
104 Nineteen 22	dane, 1999	10	1	14.99	0	<a href="http://www.adultvideoarchive.com/video/23323/nineteen-video-magazine-22/">http://www.adultvideoarchive.com/video/23323/nineteen-video-magazine-22/</a>	

105 Fuck Em All 2	All Good 1999	100	1	14.95	<a href="http://www.adultfindatabase.com/video/53739/fuck-em-all-2/">http://www.adultfindatabase.com/video/53739/fuck-em-all-2/</a>	
106 Sisters	zane, 1993	74	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
k=11010.85						
107 Anal Maniacs 5	wicked, 1987	14	1	24.95	<a href="http://www.adultfindatabase.com/video/38043/anal-maniacs-5/">http://www.adultfindatabase.com/video/38043/anal-maniacs-5/</a>	
108 Thrust Fault	vca, 1998	18	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
109 Secret Lives	sin city, 1994	25	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
110 LIn566	hulster comp	100	1	0	need more info	
111 Centerfold	sin city, 1995	25	1	14.95	<a href="http://www.adultfindatabase.com/video/9117/centerfold/">http://www.adultfindatabase.com/video/9117/centerfold/</a>	
112 Gorgeous	caballero, 1990	13	1	14.95	<a href="http://www.adultfindatabase.com/video/16129/gorgeous/">http://www.adultfindatabase.com/video/16129/gorgeous/</a>	
113 Blue Dahlia	metro, 1997	7	1	18.88	<a href="http://www.adult.com/title.rme/title=blue+delia/year=1997/blue-dahlia.htm">http://www.adult.com/title.rme/title=blue+delia/year=1997/blue-dahlia.htm</a>	
114 Lethal Woman	cdi, 1991	74	1	14.95	<a href="http://www.adult.com/title.rme/title=lethal+woman/year=1991/lethal-woman.htm">http://www.adult.com/title.rme/title=lethal+woman/year=1991/lethal-woman.htm</a>	
115 Shooting Star	xcliment, 1993	20	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
116 Talking Dirty To Me 13	dreamland, 2000	20	1	14.99	<a href="http://www.adultfindatabase.com/video/42524/talking-dirty-to-me-13/">http://www.adultfindatabase.com/video/42524/talking-dirty-to-me-13/</a>	
117 California Cocksuckers 2	sin city, 1998	10	1	7.99	<a href="http://www.adult.com/title.rme/title=california+cocksuckers+2/year=1998/california-cocksuckers-2.htm">http://www.adult.com/title.rme/title=california+cocksuckers+2/year=1998/california-cocksuckers-2.htm</a>	
118 Andrew Blake's Gifs	cablero, 1992	10	1	16.99	<a href="http://www.adult.com/title.rme/title=andrew-blake+%27s+gifs/year=1992/andrew-blake&amp;apos;s-gifs.htm">http://www.adult.com/title.rme/title=andrew-blake+%27s+gifs/year=1992/andrew-blake&amp;apos;s-gifs.htm</a>	
119 Camel Coad Confessions 4	jet mulimedia, 2001	10	1	14.95	<a href="http://www.adultfindatabase.com/video/37315/camel-coad-confessions-4/">http://www.adultfindatabase.com/video/37315/camel-coad-confessions-4/</a>	
120 Sinnoce	pepper productions, 1995	24	1	89.95	<a href="http://www.adult.com/title.rme/title=sinnocency/year=1995/sinnocence.htm">http://www.adult.com/title.rme/title=sinnocency/year=1995/sinnocence.htm</a>	
k9276.85						
121 Becoming Wet	vca, 2000	18	1	14.95	<a href="http://www.adult.com/title.rme/title=becoming+wet/year=2000/becoming-wet.htm">http://www.adult.com/title.rme/title=becoming+wet/year=2000/becoming-wet.htm</a>	
122 Generation Sex 2	video team, 1996	100	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
123 X Factor	filmco, 1984	14	1	21	<a href="http://www.adultfindatabase.com/xcart/adult_dvd/dvd_view.php?adult_dvd_id=34275&amp;partner=iafd">http://www.adultfindatabase.com/xcart/adult_dvd/dvd_view.php?adult_dvd_id=34275&amp;partner=iafd</a>	
124 Oriental Taboo 1	cdi, 1987	24	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
125 Robotbx	las vegas video, 1992	9.94	1	14.95	<a href="http://www.adult.com/title.rme/title=robotbox/year=1992/robotbox.htm">http://www.adult.com/title.rme/title=robotbox/year=1992/robotbox.htm</a>	
126 Murfy The Vampire Layer	erotic video network, 1994	10.94	1	14.95	<a href="http://www.adult.com/title.rme/title=murphy+the-vampire+layer/year=1992/murphy-the-vampire-layer.htm">http://www.adult.com/title.rme/title=murphy+the-vampire+layer/year=1992/murphy-the-vampire-layer.htm</a>	
127 Hot Chicks Do L.A	metro, 1999	16	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
128 Nothing to Hide Part 3	vca, 1977	15	1	18.99	<a href="http://www.adultfindatabase.com/xcart/adult_dvd/dvd_view.php?adult_dvd_id=28336&amp;partner=iafd">http://www.adultfindatabase.com/xcart/adult_dvd/dvd_view.php?adult_dvd_id=28336&amp;partner=iafd</a>	
129 Love Couch	vca, 1977	100	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
130 Raising Kane	fat dog, 1993	100	1	49.99	<a href="http://www.adult.com/title.rme/title=raising-kane/year=1993/raising-kane.htm">http://www.adult.com/title.rme/title=raising-kane/year=1993/raising-kane.htm</a>	
131 Europes A Poppin	1999	100	1	36	euro nudes a poppin/may not have same value of nudes a poppin franchise	
132 Old Wave Hookers	pleasure, 1995	100	1	19.95	<a href="http://www.adult.com/title.rme/title=old+wave+hookers+1/year=1995/old-wave-hookers-1.htm">http://www.adult.com/title.rme/title=old+wave+hookers+1/year=1995/old-wave-hookers-1.htm</a>	
133 Fetish	sin city, 1997	17	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
134 Babydiller	gourmet, 1983	7	1	14.95	<a href="http://www.adult.com/title.rme/title=babydiller/year=1983/babydiller.htm">http://www.adult.com/title.rme/title=babydiller/year=1983/babydiller.htm</a>	
135 Salyr	wicked, 1987	10	1	14.95	<a href="http://www.adult.com/title.rme/title=salyr/year=1987/salyr.htm">http://www.adult.com/title.rme/title=salyr/year=1987/salyr.htm</a>	
136 Taboo	standard, 1980	15	1	14.95	<a href="http://www.adultfindatabase.com/video/60524/taboo/">http://www.adultfindatabase.com/video/60524/taboo/</a>	
137 Taboo 2	standard, 1982	17	1	14.95	<a href="http://www.adultfindatabase.com/video/60525/taboo-2/">http://www.adultfindatabase.com/video/60525/taboo-2/</a>	
138 Psychosexuals 1	evil angel, 1987	13	1	39	<a href="http://www.adult.com/title.rme/title=psycho+sexuals+1/year=1987/psycho-sexuals-1.htm">http://www.adult.com/title.rme/title=psycho+sexuals+1/year=1987/psycho-sexuals-1.htm</a>	
139 Feds In Bed	filmco, 1993	13	1	14.95	<a href="http://www.adultfindatabase.com/video/13981/feds-in-bed/">http://www.adultfindatabase.com/video/13981/feds-in-bed/</a>	
140 Girls Who... Up Ass 11	NA	15	1	15	<a href="http://www.adult.com/title.rme/title=girls-who+up-ass-in-bed/">http://www.adult.com/title.rme/title=girls-who+up-ass-in-bed/</a>	
141 V The Hot One	metro, 1977	15	1	14.95	<a href="http://www.adult.com/video/42798/v-the-hot-one/">http://www.adult.com/video/42798/v-the-hot-one/</a>	
142 Things Change: My First Time	metro, 1993	12.95	1	36	<a href="http://www.adult.com/no+online+sales+only+viewing">http://www.adult.com/no+online+sales+only+viewing</a>	
143 Daisy May	vca, 1979	25	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
144 Chainin'	fat dog, 1984	100	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
145 Made In Germany	fantasy, 1987	10.94	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
k9736.62						
146 The Box	Legend	17	1	14.95	<a href="http://www.adultfindatabase.com/video/7503/box/">http://www.adultfindatabase.com/video/7503/box/</a>	
147 Seduced By the Flames	coast to coast, 2000	17	1	19.99	<a href="http://www.adultfindatabase.com/video/41667/seduced-by-the-flames/">http://www.adultfindatabase.com/video/41667/seduced-by-the-flames/</a>	
148 Girl Scout	erotic angel, 2001	74	1	14.95	<a href="http://www.adultfindatabase.com/video/42886/girl-scout/">http://www.adultfindatabase.com/video/42886/girl-scout/</a>	
149 Channel 69 part 2	coast to coast, 1996	25	1	14.95	<a href="http://www.adultfindatabase.com/video/9170/channel-69-2/">http://www.adultfindatabase.com/video/9170/channel-69-2/</a>	
150 Blazing Boners	midnight, 1992	74	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
151 Ass Attack	NA	29	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
152 Live Bail 4	pleasure, 2000	8	1	14.99	<a href="http://www.adultfindatabase.com/video/49708/live-bail-4/">http://www.adultfindatabase.com/video/49708/live-bail-4/</a>	
153 Win-A-Dale	dreamland, 2001	18	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
154 Gang Bang Fury	rosebud, 1992	7	1	14.95	<a href="http://www.adultfindatabase.com/video/15086/gang-bang-fury-1/">http://www.adultfindatabase.com/video/15086/gang-bang-fury-1/</a>	
155 Sexy Euro Gifs	platinum x, 2004	15	1	14.95	<a href="http://www.adultfindatabase.com/video/63545/sexy-euro-gifs/">http://www.adultfindatabase.com/video/63545/sexy-euro-gifs/</a>	
156 Sex Tribe	erotic angel&#x2013;beach, 2002	24	1	14.95	<a href="http://www.adult.com/title.rme/title=sex+tribe/year=2001/sex-tribe.htm">http://www.adult.com/title.rme/title=sex+tribe/year=2001/sex-tribe.htm</a>	





258 Sweet Loads 7	NA	20	1	36	<a href="http://www.adultfindatabase.com/video/60546/busted/">http://www.adultfindatabase.com/video/60546/busted/</a>
259 Busted	NA	74	1	14.95	<a href="http://www.adultfindatabase.com/video/60546/busted/">http://www.adultfindatabase.com/video/60546/busted/</a>
260 Forever Night	vca, 1998	97	1	44.65	<a href="http://www.latd.com/title.rme/title=forever+night/year=1998/forever+night.htm">http://www.latd.com/title.rme/title=forever+night/year=1998/forever+night.htm</a>
261 Jenna Loves Rocco	wild, 1996	10	1	19.95	<a href="http://www.adultfindatabase.com/video/36557/jenna+loves+rocco/">http://www.adultfindatabase.com/video/36557/jenna+loves+rocco/</a>
262 Adult Video Nudes	vca, 1993	74	1	36	<a href="http://www.adultfindatabase.com/video/28711/sex+trik-1---the+next+penetration/">http://www.adultfindatabase.com/video/28711/sex+trik-1---the+next+penetration/</a>
263 Scenes From A Bar	wild, 1998	25	1	15.99	<a href="http://www.adultfindatabase.com/video/36342/no+regrets/">http://www.adultfindatabase.com/video/36342/no+regrets/</a>
264 No Regrets	adam & eve, 1999	14	1	14.95	<a href="http://www.adultfindatabase.com/video/36342/no+regrets/">http://www.adultfindatabase.com/video/36342/no+regrets/</a>
265 Nurse Shanna	midnight, 1998	14	1	14	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
266 Cab Rides 5	rah, 1998	20	1	9.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
267 Bawdy and Soul	wild, 1998	20	1	15.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
268 69th Sense	vca, 2000	29	1	15.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
269 Toilets Tarts	NA	20	1	0	custom video?
270 Statched To The Future	elegant angel, 1991	100	1	36	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
271 Anal Encounters 5	vca, 1992	100	1	9.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
273 Pushover	wicked, 1999	25	1	15.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
274 Cycle Slut	coast to coast, 1992	10	1	15.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
275 Where The Boys Aren't 4	wild, 1993	25	1	19.95	<a href="http://www.adultfindatabase.com/video/24814/where+the+boys+arent-4/">http://www.adultfindatabase.com/video/24814/where+the+boys+arent-4/</a>
276 Cherry Truckers	vca, 1976	10	1	14.95	<a href="http://www.adultfindatabase.com/video/129251/cherry+truckers/">http://www.adultfindatabase.com/video/129251/cherry+truckers/</a>
277 Blue Girl From Planet XXX	k-beech, 2001	100	1	36	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
278 Lesbian Piss Party	seduction, 2000	100	1	36	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
279 Inside Asia	babydon, 2000	8	1	14.95	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
280 Pussycat Galore	arow, 1984	16	1	14.95	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
281 My Bare Lady	moonlight, 1989	40	1	14.95	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
282 Lacey's Secret	video team, 2002	8	1	8.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
k=16,612,62					
283 Skin Flicks	avg, 1978	24	1	28.39	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
284 Hotel California	midnight, 1998	21	1	13.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
285 Girls In Heat	Zane	7	1	18.95	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
286 Chasin' Pink	wild, 1998	25	1	19.95	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
287 Streamers	NA	10	1	0	custom?
288 Euro Trash	dane, 2005	30	1	20.15	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
289 Deep Inside Asia Carrera	NA	25	1	15.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
290 Banbabe	wild, 2002	14	1	15.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
291 F.A.B.'s 3	zero tolerance, 2004	10	1	19.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
292 Sunset's Sizzlers	sunset thorne	100	1	0	custom video?
293 Hotel Lovejoy	wild, 1998	19	1	36	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
294 Inside Porn	wicked, 2000	8	1	15	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
295 Ladies Room	caballero, 1987	14	1	14.97	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
296 Dungeon Dykes	fantastic, 1994	25	1	59.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
k=12,673,62					
297 Anal Plaything 2	rosebud, 1995	34	1	14.95	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
298 Dirty Weekend	plum, 1997	9	1	9.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
299 Girls Who Screw Girls	NA	100	1	0	need more information
300 Gothic Night Shift 3	NA	100	1	36	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
301 French Kiss	wicked, 2003	9	1	14.95	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
302 Club Erotica	metro, 1995	11	1	36	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
303 Sex Trek 1	midnight, 1995	29	1	39.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
304 Tramps	midnight, 1996	18	1	36	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
305 Barely Nineteen 2	NA	100	1	15.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
306 Telephone Expose	vca, 1996	14	1	36	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
307 Cum Swapping Sluts 2	red light district, 2002	11.5	1	15.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
k=17,380,12					
308 Oriental Taboo 3	NA	24	1	36	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
309 Nicole Stanton Story Pt. 2	caballero, 1988	14	1	36	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
310 Only The A Hole 9	digital playground, 2004	17	1	14.95	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>
311 Blue Movie	wicked, 1996	7	1	15.99	<a href="http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/">http://www.adultfindatabase.com/video/22779/nasty+city+cab+rides-5/</a>

312 Sleaze	sterling, 1997	74	1	39.99	<a href="https://www.jaf.com/title/mme/steleaze/year=1997/sleaze.htm">https://www.jaf.com/title/mme/steleaze/year=1997/sleaze.htm</a>	
313 Ripe 4	forbidden films, 1999	20	1	17.99	<a href="https://www.jaf.com/title/mme/ripe=4/year=1999/ripe-4.htm">https://www.jaf.com/title/mme/ripe=4/year=1999/ripe-4.htm</a>	
314 Sweet and Low	k-beech, 2001	34	1	29.95	<a href="https://www.jaf.com/title/mme/sweet+and+low/year=2001/sweet+and+low.htm">https://www.jaf.com/title/mme/sweet+and+low/year=2001/sweet+and+low.htm</a>	
315 Spread the Wealth	dreamland, 1994	74	1	14.95	<a href="https://www.jaf.com/title/mme/steleaze+spread+the+wealth/year=1994/spread+the+wealth.htm">https://www.jaf.com/title/mme/steleaze+spread+the+wealth/year=1994/spread+the+wealth.htm</a>	
316 Desire	erotic angel, 2001	19	1	69.98	<a href="https://www.jaf.com/possible+wrong+production+house+listed+can+be+revised">https://www.jaf.com/possible+wrong+production+house+listed+can+be+revised</a>	
317 Thunder and Lightning	midnight, 1996	74	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
318 Sinboy 1	sin city, 1996	24	1	8.95	<a href="https://www.jaf.com/title/mme/sinboy+1/year=1996/sinboy+1.htm">https://www.jaf.com/title/mme/sinboy+1/year=1996/sinboy+1.htm</a>	
319 Young Stuff 6	sin city, 2002	11	1	15.99	<a href="https://www.jaf.com/title/mme/young+stuff+6/year=2002/young+stuff+6.htm">https://www.jaf.com/title/mme/young+stuff+6/year=2002/young+stuff+6.htm</a>	
320 Kinmaxx	sin city, 1997	5	1	15.99	<a href="https://www.jaf.com/title/mme/kinmaxx/year=1997/kinmaxx.htm">https://www.jaf.com/title/mme/kinmaxx/year=1997/kinmaxx.htm</a>	
321 Unshamed	fat dog, 1993	100	1	36	<a href="https://www.jaf.com/discontinued">https://www.jaf.com/discontinued</a>	
k13216.12						
322 Intrigue	sin city, 1998	25	1	36	<a href="https://www.adult.com/no+listing+available+online">https://www.adult.com/no+listing+available+online</a>	
323 Oriental Taboo 4	NA	24	1	36	<a href="https://www.hot.com/all+discontinued">https://www.hot.com/all+discontinued</a>	
324 XXXanadu	heatwave, 1995	74	1	14.95	<a href="https://www.hot.com/value+decrease">https://www.hot.com/value+decrease</a>	
325 Intimate Strangers	plum, 1998	8	1	10.79	<a href="https://www.adult.com/example.com/766475/intimate+strangers+porn+videos.htm?partner_id=9438723&amp;utm_source=Ad+Network+Marketing&amp;utm_medium=Referral&amp;utm_campaign=Ad+Network+Marketing">https://www.adult.com/example.com/766475/intimate+strangers+porn+videos.htm?partner_id=9438723&amp;utm_source=Ad+Network+Marketing&amp;utm_medium=Referral&amp;utm_campaign=Ad+Network+Marketing</a>	
326 Pregnant	NA	50	1	0	not enough information to evaluate	
327 Ebony Does Ivory 9	sin city	100	1	15.99	<a href="https://www.gar.com/studio+is+Western+Visuals">https://www.gar.com/studio+is+Western+Visuals</a>	
328 Hoopers	midnight	25	1	0	not enough information to evaluate	
329 Taliana 1	private, 1997	36	1	69.98	<a href="https://www.adult.com/value+increase">https://www.adult.com/value+increase</a>	
330 Powerbone	vca, 1976	100	1	7.95	<a href="https://theetel.com/also+known+as+(soup+man)+https://www.jaf.com/title/mme/soup+man/year=1976/soup+man.htm">https://theetel.com/also+known+as+(soup+man)+https://www.jaf.com/title/mme/soup+man/year=1976/soup+man.htm</a>	
331 Drop Sex	evil angel, 1997	24	1	6.49	<a href="https://www.adult.com/value+decrease">https://www.adult.com/value+decrease</a>	
332 Other Side of Julie	metro, 1978	64	1	28.4	<a href="https://www.adult.com/value+decrease">https://www.adult.com/value+decrease</a>	
k18,407.12						
333 Time Machine	wicked, 1986	64	1	28.85	<a href="https://www.adult.com/value+decrease">https://www.adult.com/value+decrease</a>	
334 Hollywood Vice	vidco, 1985	25	1	19.88	<a href="https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=106714&amp;partner=afid">https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=106714&amp;partner=afid</a>	
335 Taped College Confessions 5	rah, 1999	7	1	29.99	<a href="https://www.adult.com/value+increase">https://www.adult.com/value+increase</a>	
336 40 Something and Still Hot	NA, 1995	100	1	36	<a href="https://www.jaf.com/no+online+distribution">https://www.jaf.com/no+online+distribution</a>	
337 Bad Wives	wvd, 1997	20	1	59.99	<a href="https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=26735&amp;partner=afid">https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=26735&amp;partner=afid</a>	
338 Sexed	filmco, 1993	9.94	1	9.94	<a href="http://vintage-erotic.net/us/sexed-1993">http://vintage-erotic.net/us/sexed-1993</a>	
339 Menstrators	NA	14	1	0	not enough information to evaluate	
340 Art of Sex	NA	100	1	0	not enough information to evaluate	
341 Girls Club	vca, 1990	20	1	46.45	<a href="https://www.cduiverse.com/productinfo.asp?PID=12359740&amp;style=ice&amp;frm=k_atd.com">https://www.cduiverse.com/productinfo.asp?PID=12359740&amp;style=ice&amp;frm=k_atd.com</a>	
342 Black Chill	wet, 1986	14	1	29.95	<a href="https://www.adult.com/value+increase">https://www.adult.com/value+increase</a>	
343 31 Girl Pick Up	husler/wvd	100	1	36	<a href="https://www.jaf.com/no+longer+in+distribution">https://www.jaf.com/no+longer+in+distribution</a>	
344 On Trial 4	wvd, 1992	14	1	25.88	<a href="https://www.adult.com/value+increase">https://www.adult.com/value+increase</a>	
345 On The Come Line	midnight, 1993	23	1	36	<a href="https://www.adult.com/not+available+online">https://www.adult.com/not+available+online</a>	
346 Picture Perfect	wvd, 1996	14	1	16.99	<a href="https://www.dogporn.com/dogporn/931263/picture+perfect+porn+dvd.htm?partner_id=9438723&amp;utm_source=Ad+Network+Marketing&amp;utm_medium=Referral&amp;utm_campaign=Ad+Network+Marketing">https://www.dogporn.com/dogporn/931263/picture+perfect+porn+dvd.htm?partner_id=9438723&amp;utm_source=Ad+Network+Marketing&amp;utm_medium=Referral&amp;utm_campaign=Ad+Network+Marketing</a>	
k13783.06						
347 Maxine	excalibur films, 1988	9.95	1	36	<a href="https://www.jaf.com/no+longer+available+online">https://www.jaf.com/no+longer+available+online</a>	
348 Golden Touch	wicked, 1985	24	1	39.19	<a href="https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=54717&amp;partner=afid">https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=54717&amp;partner=afid</a>	
349 Perverse Desires	leisure time	6	1	3.88	<a href="https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=203411&amp;partner=afid">https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=203411&amp;partner=afid</a>	
350 Sin-A-Bun	NA	100	1	0	not enough information to evaluate	
351 Older Wiser Sexier	odyssey, 2002	100	1	36	<a href="https://www.adult.com/discontinued">https://www.adult.com/discontinued</a>	
352 The Perfect Pair	dreamland, 2001	20	1	19.75	<a href="https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=32893&amp;partner=afid">https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=32893&amp;partner=afid</a>	
353 Asians Over 40	sammal, 2000	22	1	29.99	<a href="https://www.adult.com/marktplace.com/dvd_view_37454.html">https://www.adult.com/marktplace.com/dvd_view_37454.html</a>	
354 Little Shop of Whores	wvd, 1987	9.94	1	36	<a href="https://www.jaf.com/discontinued">https://www.jaf.com/discontinued</a>	
355 Hustlers	midnight, 1994	16	1	59.98	<a href="https://www.adult.com/value+increase">https://www.adult.com/value+increase</a>	
356 Wild Things 2	metro, 1986	14	1	20.99	<a href="https://www.cduiverse.com/productinfo.asp?PID=6757469&amp;style=ice&amp;frm=k_SF.atd.com">https://www.cduiverse.com/productinfo.asp?PID=6757469&amp;style=ice&amp;frm=k_SF.atd.com</a>	
357 Oriental Taboo 2	cindevilla	24	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
k19,377.95						
358 Vais Gals	in hand, 1990	18	1	36	<a href="http://www.adult.com/discontinued">http://www.adult.com/discontinued</a>	
359 Extreme Pleasures	erotic angel, 2001	18	1	39.99	<a href="https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=33380&amp;partner=afid">https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=33380&amp;partner=afid</a>	
360 Sins of The Flesh	heatwave, 1998	24	1	44.94	<a href="https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=27821&amp;partner=afid">https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=27821&amp;partner=afid</a>	
361 Spinners 2	wicked, 1996	24	1	34.99	<a href="https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=60495&amp;partner=afid">https://www.adult.com/marktplace.com/xcart/adult_dvd/dvd_view.php?adul_dvd_id=60495&amp;partner=afid</a>	



	363 Like Mother Like Daughter	vca, 1973	9	1	22.99	<a href="https://www.adultvalue.com/sales-listed">https://www.adultvalue.com/sales-listed</a>	
	364 Best Regime Bardot	filmmco, 1986	22	1	36	<a href="https://www.adultvalue.com/sales-listed">https://www.adultvalue.com/sales-listed</a>	
	365 Temple of Poon	plush, 1996	14	1	9.99	<a href="https://www.adultvalue.com/36043/san-fernando-jones-and-the-temple-of-poon-porn-movies.html">https://www.adultvalue.com/36043/san-fernando-jones-and-the-temple-of-poon-porn-movies.html</a>	
	366 Oriental Taboo 12	underella	24	1	12.23	<a href="https://www.sugartant.com/1990299/oriental-taboo-porn-videos.html?partner_id=94387233&amp;utm_source=IAF&amp;utm_medium=google&amp;utm_campaign=IAF">https://www.sugartant.com/1990299/oriental-taboo-porn-videos.html?partner_id=94387233&amp;utm_source=IAF&amp;utm_medium=google&amp;utm_campaign=IAF</a>	
	367 Virgin Dreams	vca, 1976	19	1	19.99	<a href="https://www.gamemink.com/display_product.php?id=132002&amp;efefaid6mail=s&amp;src=q">https://www.gamemink.com/display_product.php?id=132002&amp;efefaid6mail=s&amp;src=q</a>	
	368 Jane Bond Vs. Thunderthighs	video, 1988	11	1	12.23	<a href="https://www.adultvalue.com/1323514/jane-bond-meets-thunderthighs-porn-movies.html">https://www.adultvalue.com/1323514/jane-bond-meets-thunderthighs-porn-movies.html</a>	
	369 Smooth Ride	wicked, 1996	8	1	15	<a href="https://www.adultvalue.com/xcart/adult_dvd/dvd_view.php?id=62750&amp;partner=field">https://www.adultvalue.com/xcart/adult_dvd/dvd_view.php?id=62750&amp;partner=field</a>	
	370 Lingerie Gallery	NA	20	1	0	not enough information to evaluate	
	371 Layovers	erotic angel, 2002	29	1	36	<a href="https://www.adultvalue.com/online">https://www.adultvalue.com/online</a>	
	372 Night Dreams	vca, 1981	9	1	11.89	<a href="https://www.pornporn.com/pornporn/117650/3night-dreams-porn-dvd.html?partner_id=94387233&amp;utm_source=IAF&amp;utm_medium=google&amp;utm_campaign=IAF">https://www.pornporn.com/pornporn/117650/3night-dreams-porn-dvd.html?partner_id=94387233&amp;utm_source=IAF&amp;utm_medium=google&amp;utm_campaign=IAF</a>	
k=14261.95							
	373 Society Affairs	caballero, 1982	16	1	23	<a href="https://www.adultvalue.com/xcart/adult_dvd/dvd_view.php?id=1653&amp;partner=field">https://www.adultvalue.com/xcart/adult_dvd/dvd_view.php?id=1653&amp;partner=field</a>	
	374 Delicious	video-x-pix, 2004	5	1	9.51	<a href="https://www.adultvalue.com/dvd_view_70477.html">https://www.adultvalue.com/dvd_view_70477.html</a>	
	375 Euro Nymphs	midnight, 2001	59	1	99	<a href="https://www.adultvalue.com/dvd_view_70477.html">https://www.adultvalue.com/dvd_view_70477.html</a>	
	376 Bust A Nut in Grandma's Butt	totally tasteless, 1999	100	1	14.95	<a href="https://www.adultvalue.com/video/7962/bust-a-nut-in-grandma-s-butt/">https://www.adultvalue.com/video/7962/bust-a-nut-in-grandma-s-butt/</a>	
	377 Flash Flood 4	coast to coast	30	1	7.19	<a href="https://www.adultvalue.com/video/7962/bust-a-nut-in-grandma-s-butt/">https://www.adultvalue.com/video/7962/bust-a-nut-in-grandma-s-butt/</a>	
	378 University Coeds 24	dane, 2000	24	1	16.99	<a href="https://www.adultvalue.com/288019/university-co-eds-24-porn-videos.html">https://www.adultvalue.com/288019/university-co-eds-24-porn-videos.html</a>	
	379 Heart and Soul	wicked, 1987	25	1	11.89	<a href="https://www.pornporn.com/pornporn/16429/heart-soul-porn-dvd.html?partner_id=94387233&amp;utm_source=IAF&amp;utm_medium=google&amp;utm_campaign=IAF">https://www.pornporn.com/pornporn/16429/heart-soul-porn-dvd.html?partner_id=94387233&amp;utm_source=IAF&amp;utm_medium=google&amp;utm_campaign=IAF</a>	
	380 Competent People	fat dog, 1995	25	1	36	<a href="https://www.adultvalue.com/dvd_view.php?id=62750&amp;partner=field">https://www.adultvalue.com/dvd_view.php?id=62750&amp;partner=field</a>	
	381 3-AM	metro, 1975	34	1	9.95	<a href="https://www.hotvalue.com">https://www.hotvalue.com</a>	
	382 I Swear I'm 16 #8	NA	18	1	0	not enough information to evaluate	
	383 Dirty Little Perverts	dreamland, 2000	6	1	4.99	<a href="https://www.adultvalue.com/dvd_view_60889.html">https://www.adultvalue.com/dvd_view_60889.html</a>	
k=19975.95							
	384 Golden Lotus	husler, 1989	12	1	44.78	<a href="https://www.adultvalue.com">https://www.adultvalue.com</a>	
	385 Caffe Flesh 2	vca, 1997	25	1	15.99	<a href="https://www.adultvalue.com/1685086/caffe-flesh-2-porn-videos.html">https://www.adultvalue.com/1685086/caffe-flesh-2-porn-videos.html</a>	
	386 Erotic Penetration	filmmco, 1986	100	1	9.95	<a href="https://www.hotmovies.com/video/16714/Erotic-Penetration/?vid=221055">https://www.hotmovies.com/video/16714/Erotic-Penetration/?vid=221055</a>	
	387 Night of The Vampires	NA	100	1	0	not enough information to evaluate	
	388 Felinas	vca, 1972	6	1	21.99	<a href="https://www.adultvalue.com">https://www.adultvalue.com</a>	
	389 Beach Blondes	NA	100	1	36	<a href="https://www.adultvalue.com">https://www.adultvalue.com</a>	
	390 Wild Cats	wicked, 2003	25	1	11.51	<a href="https://www.adultvalue.com/548317/wildcats-porn-movies.html">https://www.adultvalue.com/548317/wildcats-porn-movies.html</a>	
	391 Hollywood Hustle	venus 99, 1990	10	1	36	<a href="https://www.adultvalue.com">https://www.adultvalue.com</a>	
	392 Fat Beach Patrol	metroplis, 2000	19	1	5.03	<a href="https://www.adultvalue.com/576762/fat-beach-patrol-porn-movies.html">https://www.adultvalue.com/576762/fat-beach-patrol-porn-movies.html</a>	
	393 Speak His	NA	100	1	0	not enough information to evaluate	
	394 The Watcher	wild, 1999	18	1	49.99	<a href="https://www.adultvalue.com">https://www.adultvalue.com</a>	
	395 Nobody's Lookin'	vca, 1993	74	1	36	<a href="https://www.adultvalue.com">https://www.adultvalue.com</a>	
	396 American Bukake 11	jm productions, 2000	11	1	16.99	<a href="https://www.adultvalue.com/2646314/american-bukake-11-porn-videos.html">https://www.adultvalue.com/2646314/american-bukake-11-porn-videos.html</a>	
	397 18 Young and Tight 5	dreamland, 2000	34	1	14.99	<a href="https://www.adultvalue.com">https://www.adultvalue.com</a>	
k=20.919.95							
	398 Nice GHS Do Anal Too	NA	15	1	14.95	<a href="http://www.adultvalue.com/video/23192/nice-gifs-like-anal-too/">http://www.adultvalue.com/video/23192/nice-gifs-like-anal-too/</a>	
	399 Pyromanic	soho, 1990	74	1	36	<a href="http://www.adultvalue.com">http://www.adultvalue.com</a>	
	400 Heelseekers	plush, 1996	14	1	36	<a href="http://www.adultvalue.com">http://www.adultvalue.com</a>	
	401 Sorcery Sex Killers 2	vca, 1992	9	1	15.99	<a href="https://vod.adrt.com/s/traqhl/movies/27295/sorcery-sex-killers-2?ref=AEBN-029310">https://vod.adrt.com/s/traqhl/movies/27295/sorcery-sex-killers-2?ref=AEBN-029310</a>	
	402 Missionary Position Impossible 2	dreamland, 2000	22	1	69.89	<a href="https://www.adultvalue.com">https://www.adultvalue.com</a>	
	403 Deep Cheeks 11	rosebud	23	1	10.49	<a href="https://www.gamemink.com/display_product.php?id=220060&amp;efefaid6mail=s&amp;src=q">https://www.gamemink.com/display_product.php?id=220060&amp;efefaid6mail=s&amp;src=q</a>	
	404 Rocket Girls	vca, 1993	29	1	34.95	<a href="https://www.adultvalue.com/xcart/adult_dvd/dvd_view.php?id=30294&amp;partner=field">https://www.adultvalue.com/xcart/adult_dvd/dvd_view.php?id=30294&amp;partner=field</a>	
	405 Exposed	new machine, 2002	100	1	14.95	<a href="https://www.hotmovies.com/video/391734/jane-jane-s-on-exposed/?vid=221655">https://www.hotmovies.com/video/391734/jane-jane-s-on-exposed/?vid=221655</a>	
	406 Blow Dry	wild, 1997	18	1	12.99	<a href="http://www.adultvalue.com/video/40036/blow-dry/">http://www.adultvalue.com/video/40036/blow-dry/</a>	
	407 University Coeds 23	dane, 1997	14	1	11.89	<a href="http://www.adultvalue.com/video/42962/university-co-eds-23/">http://www.adultvalue.com/video/42962/university-co-eds-23/</a>	
	408 The Show	wild, 1996	78	1	36	<a href="http://www.adultvalue.com">http://www.adultvalue.com</a>	
k=20.919.95							
	409 Best of Ready to Drop	filmmco	100	1	12.99	<a href="https://www.adultvalue.com/dvd_view_93767.html">https://www.adultvalue.com/dvd_view_93767.html</a>	
	410 Real Tickets 1	vca	74	1	36	<a href="https://www.adultvalue.com">https://www.adultvalue.com</a>	
	411 Pornocopia 7	adam & eve	100	1	9.95	<a href="https://www.adultvalue.com/dvd_view_935148.html">https://www.adultvalue.com/dvd_view_935148.html</a>	
	412 Giftfriends	vca, 1983	17	1	4.24	<a href="https://www.adultvalue.com">https://www.adultvalue.com</a>	

[illegible]





## Deposition 1

Dr. Victoria Hartmann Deposition

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DAVID ELLIOT WERKING,  
an Indiana Resident,

Plaintiff,

Case No. 1:19-cv-276

vs.

HON. PAUL L. MALONEY

BETH EILEEN WERKING AND  
PAUL MICHAEL WERKING,  
Michigan Residents,

Defendants.

REMOTE ZOOM DEPOSITION OF

VICTORIA HARTMANN, Ph.D.

Taken on Thursday, January 28, 2021, commencing at 1:30 p.m.,  
pursuant to Notice.

APPEARANCES:

FOR THE PLAINTIFF: POWERS & GREENGARD  
Mr. Miles L. Greengard (P76812)  
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REPORTED BY: MS. ARLENE M. WRIGHT, CSR-34, RPR, FCRR  
Licensed in MI, GA, and FL

(Whereupon, counsel stipulated to this reporter

remotely administering the oath to the witness and remotely  
reporting this deposition.)

THE REPORTER: Dr. Hartmann, will you raise your  
right hand, please?

Do you solemnly swear or affirm that the testimony  
you will give in this cause will be the truth, the whole  
truth, and nothing but the truth under penalty of law?

THE WITNESS: I do.

THE REPORTER: I thank you.

EXAMINATION

BY MS. VANDERBROEK:

Q. Dr. Hartmann, welcome. Thank you for being here today. You  
are a doctor, correct?

A. **I hold a Doctor of Philosophy and a Doctor of Human  
Sexuality.**

Q. Okay, what was the training involved in getting those  
degrees?

A. **With regard to the DHS, which is the Doctor of Human  
Sexuality, it was 60 hours of study of various human  
sexuality principles and practices including anthropology,  
biology, sexology, counseling, training, etc., and a DHS  
dissertation at the end of that which in this case was  
statistical.**

Q. And what do you do with that degree?

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VICTORIA HARTMANN, Ph.D., DEPOSITION EXHIBITS

(Original exhibits were scanned and provided to both counsel,  
sealed with the original transcript.)

EXHIBIT: PAGE:

Exhibit 1 Document titled Receipts of Property 8

Document titled List of Missing Items

Exhibit 2 Hartmann Catalog - Erotic Film Collection 12

Hartmann Appraisal Report

A. **Well, I followed it up with a Ph.D. which is a slightly**

different degree. The sexology degree is more of a, an  
applicable degree to providing counseling and sexological  
services, talk therapy, etc., and it's an adjunct to, say, a  
Masters in counseling or social work. The Ph.D. is more of  
an academic degree, and for that I did a dissertation on a  
phenomenology of users in online extreme pornography  
communities. And that is more used for academic pursuits,  
and that's what I base my current and ongoing academic  
pursuits on such as further research, writing journal  
articles, etc.

Q. And have you written a number of journal articles?

A. **I've written about five. One is under revision; the other  
four are like it happens in academia, were rejected. That's  
the fun of writing journal papers. You get many, many years  
to refine your work.**

Q. And what do you do for a living?

A. **I'm the executive director of the Erotica Heritage Museum in  
Las Vegas.**

Q. And what do you do in that position?

A. **I'm the administrator of all of the operations of the museum;**  
so I not only handle budgeting, I oversee the curating staff,  
the valuations of the curating staff, the implementation of  
exhibits, um, marketing, events. So I have oversight of all  
of the operations of the museum.

1 My primary function, though, is budgeting and more  
 2 administrative oversight.  
 3 Q. And do you have any particular experience in any of the  
 4 different areas that you mentioned?  
 5 A. **I centered my academic work on examining the nature of**  
 6 pornography, its effects on people and the market of  
 7 pornography.  
 8 Q. By "market," you mean?  
 9 A. **The business, the business of pornography, I am sorry. Let**  
 10 me clarify.  
 11 Q. And you mention you oversee the valuations. Do you do  
 12 valuations or do you hire an expert to come in and do  
 13 valuations?  
 14 A. **It depends on what the collection is. For instance, if it's**  
 15 a collection that the museum is going to acquire, we  
 16 generally do those valuations in-house and I have various  
 17 people that assist with that. My curating supervisor, she  
 18 has more of an expertise in literary and arts valuations.  
 19 She's pursuing her Masters degree in Library Sciences and so  
 20 that's where her expertise comes in. I generally do the  
 21 pornography simply because that's my area of expertise.  
 22 If there's a piece of art or artifact that's  
 23 outside the scope of what we are able to value, then we'll  
 24 bring in an expert. The issue there is that in terms of  
 25 erotic art, pornography, etc., there are limited folks who

1 have expertise in that simply because it's a field that's  
 2 looked down upon by most valuations societies.  
 3 Q. Have you done any additional work in valuations outside of  
 4 your work in the Erotica Museum?  
 5 A. **Beyond what I did in my doctoral work, no.**  
 6 Q. No T.V. shows or anything like that that --  
 7 A. **Oh, have I done media, yes. I've done media talking about**  
 8 pornography, the market of pornography, how it affects people  
 9 for -- my most recent article was just last week, was it last  
 10 week? For GQ Magazine with regard to the Arnie Hammer  
 11 situation in Hollywood. I was asked by GQ Magazine to  
 12 comment on extreme pornography. And I've also done articles  
 13 for Las Vegas Weekly, you know, review journals, to  
 14 interviews by Comedy Central, John Stuart Show, etc., so I've  
 15 done several appearances both radio and television, yes.  
 16 Q. And you were asked to value this particular set of items,  
 17 correct?  
 18 A. **Correct.**  
 19 Q. You were paid for that service?  
 20 A. **That is correct.**  
 21 Q. Were you paid to render any particular opinion?  
 22 A. **No. I was paid to render an opinion but not any opinion in**  
 23 any particular direction, no.  
 24 Q. You were given a list of items, correct?  
 25 A. **That is correct.**

1 Q. Those items would be what we are showing as, let me see if I  
 2 can share my screen. You should be seeing an Adobe list.  
 3 Does this appear to be the list you were given?  
 4 A. **That is correct.**  
 5 Q. And this would be the other part of that list. Based on that  
 6 list, did you have sufficient facts to be able to value the  
 7 items?  
 8 A. **In most cases, yes.**  
 9 Q. And when you are valuing is there a set of principles or  
 10 methods that you use to value the items?  
 11 A. **Yes, however, my screen froze so I can't access that.**  
 12 Q. There it goes.  
 13 A. **Okay, here. Here we go. Could you restate the question,**  
 14 please? I got lost in the freeze of the screen.  
 15 Q. Yes. When you are valuing something is there a set of  
 16 principles or methods that you use to value those items?  
 17 A. **Yes, so what I, the approach that I used was fair market**  
 18 value valuation, and what that is defined as is the price at  
 19 which property changes hands between a willing buyer and a  
 20 willing seller and both the buyer and seller having  
 21 reasonable knowledge in facts.  
 22 And the approach that I use, there are three  
 23 commonly used appraisal processes to determine value: The  
 24 cost approach value includes either reproduction or  
 25 replacement cost of the property, either new or depreciated.

1 And how that is applied is if the individual has to recreate  
 2 the material through another production or assembling the  
 3 same folks together to film that, or an artist, or so forth.  
 4 The second one was income approach to value, which  
 5 is the individual who is in possession of this material going  
 6 to make money from it. In other words, is there an  
 7 anticipated future benefit of income.  
 8 And then the market comparison approach to value is  
 9 what are the materials currently available for, valued at,  
 10 etc. And that was the approach that I utilized was the  
 11 market comparison.  
 12 (At 1:36 p.m., Hartmann, Ph.D., Deposition Exhibit  
 13 No. 1 was marked.)  
 14 Q. And there was sufficient information in that exhibit which  
 15 we're marking as Defense Hartmann Depo Exhibit 1 to apply  
 16 those principles and methods to that item list?  
 17 A. **In most cases there is a list on Exhibit B, I believe it's**  
 18 Exhibit B, the spreadsheet. There were some titles that we  
 19 were unable to determine. I would say a good 85 to 90  
 20 percent we were able to determine or make an assessment on  
 21 comparable values in the marketplace, yes.  
 22 Q. Is this the, I don't know if you can see the Excel  
 23 spreadsheet. Is this the spreadsheet you were talking about?  
 24 A. **That is not the spreadsheet that's on my screen. I'm seeing**  
 25 the report.

1 I now have the Excel sheet pulled up. Yeah.

2 That's the one.

3 Q. And this was generated as part of the report that you  
4 created, correct?

5 MR. GREENGARD: My internet cut out, so the last  
6 thing I heard was introducing what I believe you've marked as  
7 Exhibits 1 and 2. Those were 5 and 6 of the original  
8 Complaint so I was hoping we could get a quick rundown of the  
9 past 45 seconds or so that I missed.

10 MS. VANDERBROEK: Those two exhibits, I'm combining  
11 those into one exhibit.

12 MR. GREENGARD: And then what else happened.

13 MS. VANDERBROEK: I had Dr. Hartmann explain  
14 whether, what the principles and methods are for valuation  
15 and whether the list and whether Defense Hartmann Depo  
16 Exhibit 1 was sufficient for her to be able to apply those  
17 principles and methods to that list. She said she generated  
18 a report based on that and a spreadsheet. This is the  
19 spreadsheet she created. She just verified that and that she  
20 created a report that went along with that and I'm now ready  
21 to talk about that report.

22 MR. GREENGARD: I ask that you re-ask the  
23 principles and methods question just so that I don't have to  
24 do it when we're done so I can hear the answer.

25 MS. VANDERBROEK: Okay.

1 MR. GREENGARD: I apologize. I switched to a  
2 different network so hopefully that won't happen again.

3 MS. VANDERBROEK: Okay, so let me back up then.

4 BY MS. VANDERBROEK:

5 Q. Dr. Hartmann, you were given a list of items that we are  
6 marking Defense Hartmann Deposition Exhibit 1. These are  
7 that list, correct?

8 A. **Correct.**

9 Q. And from that, when you value something do you use any  
10 particular principles or methods by which you value those  
11 items?

12 A. **In this case I used the appraisal based on fair market value.**

13 The definition of that is the price when property changes  
14 hands between a willing buyer, a willing seller, neither  
15 having to buy or sell, both having reasonable knowledge to  
16 relevant facts.

17 There are three approaches that can be used toward  
18 valuing items of this nature of personal property:

19 One is the cost approach value, which includes  
20 either reproduction or replacement cost of property and that  
21 applies to whether or not the individual, in this case the  
22 plaintiff, would have to reproduce the material through  
23 either a new production, hiring the performers, or otherwise  
24 having to replace it through the production of the item  
25 itself.

1 The income approach to value is another option that  
2 can be used which is whether or not the individual, in this  
3 case the plaintiff, would be able to generate income or  
4 revenue from the material such as if he was a production  
5 house that was producing that materials. That didn't apply  
6 here either.

7 And then the market comparison approach to value,  
8 which estimates the value by comparison with properties in  
9 the relevant market, and that was the approach that I chose  
10 to utilize in this particular valuation.

11 Q. And the lists that were provided to you give you sufficient  
12 facts to apply those principles and methods to that list?

13 A. **In most cases, yes. There were of course some titles I was**  
14 unable to determine, but I would say 85 to 90 percent of the  
15 materials that were listed I was able to determine the value  
16 of.

17 Q. And did you generate a report showing that valuation?

18 A. **I did in the form of a spreadsheet which was then summarized**  
19 in the valuation report -- the appraisal report, I am sorry.  
20 The appraisal report.

21 Q. And is this the spreadsheet that you generated?

22 A. **That's correct.**

23 Q. And does this appear to be the report that you generated?

24 A. **That is the appraisal report, yes.**

25 MS. VANDERBROEK: If we could mark those two items

1 together as Defense Hartmann Deposition Exhibit 2.

2 (At 1:42 p.m., Hartmann, Ph.D., Deposition Exhibit  
3 No. 2 was marked.)

4 Q. What valuation total did you come to?

5 A. **One moment. The total appraisal came to \$15,446.06.**

6 Q. And what assumptions were made in coming to that number?

7 A. **There were -- well, one moment.**

8 Q. I guess let me clarify. Did you assume that they were  
9 originals or of a certain media format or purchased versus  
10 copied, etc.?

11 A. **I based the appraisal on the assumptions that the materials**  
12 had been purchased originally by the claimant -- I am sorry,  
13 the plaintiff, that they were largely purchased in either VHS  
14 or disc format at the time of production or close to the time  
15 of production and that they were purchased in either an  
16 online or an in-person store. In-person purchase.

17 Q. Would the values be different if the items were purchased off  
18 the internet streaming as a streaming format and then later  
19 burned to disc versus originally being sold in disc or VHS  
20 format?

21 A. **Considering the timeline of the purchases, streaming was much**  
22 less available in the marketplace at the time. So when it  
23 was available, I defaulted to a disc form or a DVD form, as  
24 VHS is largely unavailable in the marketplace these days and  
25 streaming is much more common.



1 However, at the time that these items were  
 2 purchased, streaming was less common and thus I defaulted to  
 3 a tangible, physical item first and then if those weren't  
 4 available I went to streaming.  
 5 Q. And you said at the time purchased. What did you assume for  
 6 the time purchased? Did you assume it was purchased in the  
 7 last 10 years, 15 years, two years?  
 8 A. **Considering that most of the items were purchased in a**  
 9 tangible, physical format, roughly in the last 15 to 20  
 10 years.  
 11 Q. Would the valuation be different if they were copied or  
 12 reproduced as opposed to being in an original format?  
 13 A. **Can you state the question again, please?**  
 14 Q. Would the valuation amounts be different if the content were  
 15 copied or reproduced rather than the original purchase  
 16 format? For example --  
 17 A. **How do you -- the way I'm understanding the question is**  
 18 you're implying that the material could have been downloaded  
 19 illegally and copied to a disc?  
 20 Q. Potentially, or borrowed from a friend and copied or from a  
 21 library and copied sort of thing.  
 22 A. **That was not considered in the valuation.**  
 23 Q. Would that change that valuation if it had been considered?  
 24 A. **Yes, because then there wouldn't have been any out-of-pocket**  
 25 costs to replace.

1 Q. So the number would have been lower then rather than higher,  
 2 or higher rather than lower?  
 3 A. **Lower rather than higher.**  
 4 Q. Alright, you mentioned some items were unable to be valued.  
 5 Why?  
 6 A. **Either they were, despite our best efforts to find them, they**  
 7 were completely unavailable, not found on any database or on  
 8 any kind of resource website, or their titles were too vague  
 9 and could not be even located down to say a production house.  
 10 And that was one of the methods that I used was going to  
 11 production houses and seeing if there were similar titles of  
 12 that nature. Or they were outside of the scope of the  
 13 valuation simply because they either were custom, appeared to  
 14 be custom materials that might have been commissioned, at  
 15 least the title could imply that, or they were materials that  
 16 were simply outside of my scope of valuation such as You  
 17 Can't Get Enough Dog.  
 18 Q. Let me unpack that a little. When you say custom video or  
 19 custom commission, what do you mean by that?  
 20 A. **So there's a difference in -- I can't scroll this document**  
 21 that is up on my screen. There are four different types of  
 22 materials, or five I should say. Let me restate that.  
 23 There are five different kinds of materials. There  
 24 are mainstream materials which are commonly found in the  
 25 marketplace. They are done by well known or semi well known

1 production companies, and those are generally the ones that  
 2 can be valued or appraised the easiest because they either  
 3 are still on the market, can be found in terms of similar  
 4 titles or they have a mainstream sexual content that can be  
 5 found. Niche materials are a little bit harder to find.  
 6 They have aspects of paraphilic behaviorism such as  
 7 urination, feces, etc.

8 But considering that fetishized materials can also  
 9 be found on the marketplace nowadays a little bit easier,  
 10 those are still within the realm of valuing or appraising  
 11 with relative ease.

12 Custom materials are materials where say the  
 13 plaintiff contacted a model that could be contacted on social  
 14 media or in, you know, by mail or usually by e-mail and in  
 15 that case through a website. They then negotiate that custom  
 16 material. So the model will say "Okay, for this particular  
 17 one-of-a-kind film that I am going to do for you where I'm  
 18 dressed a certain way or I perform a certain act, I charge  
 19 this much." And then there is a negotiation between the  
 20 purchaser and the model to produce that material, so that's  
 21 what's defined as custom material.

22 Q. And when you talk about something outside of the scope of  
 23 your valuation or expertise, what kind of things are you  
 24 talking about there?

25 A. **Titles that appear to be, the titles that appear to be -- I'm**

1 looking at the titles here. Titles that have words in them  
 2 such as Animal Variety, Ultimate Horse, Can't Get Enough Dog.  
 3 While those materials are not films that could be depicting  
 4 animals in sexual activities, they are not defined prohibited  
 5 forms of speech, but I'm not, I don't have any experience in  
 6 valuing materials of those nature, so it's just outside the  
 7 scope of what I was able to do in this particular valuation.  
 8 I don't have the expertise to value those materials.

9 MS. VANDERBROEK: Okay. Thank you. I think that's  
 10 all my questions.

11 MR. GREENGARD: Dr. Hartmann, I have a few  
 12 questions for you and we'll get you on your way.

13 EXAMINATION

14 BY MR. GREENGARD:

15 Q. You said extreme pornographic communities is where you have  
 16 your expertise. The adjective "extreme," does that mean by  
 17 fetish, or is it, does it mean something else? And, if so,  
 18 what does it mean?

19 A. **That's a very good question.**

20 Q. Thank you.

21 A. **What I mean by extreme are those types of paraphilias, at**  
 22 least in my expertise, that pertain to things like  
 23 necrophilia and the various sub-types of necrophilia  
 24 fetishes, so that's what I mean by "extreme." Those would be  
 25 probably the most extreme. Other than child pornography,

1 necrophilic pornography is considered the same.

2 Q. So fetishes for senior citizens, or bondage, or things like

3 that, that would not be defined as extreme?

4 A. **No.**

5 Q. And I want to circle back to the last question. You stated

6 that given some of the titles, it was possible that some of

7 the destroyed property could have depicted animals, correct?

8 A. **Based on the titles, could have. I can't verify that since I**

9 haven't seen the title.

10 Q. But it could be something like Reservoir Dogs, that's not

11 actually about dogs at all. Is that fair?

12 A. **I would say that's reaching simply because when we are**

13 talking about these titles in a sexual context, in a

14 pornographic collection it's more likely that they depict

15 animals or include an animal. And I want to make sure that I

16 clarify that and that I'm implicit in that that I stated in

17 my report depicting animals in sexual activity, it doesn't

18 mean that it could depict the animals are engaged in sexual

19 activity, just that there is sexual activity and seemingly

20 from the title, animals could be in the film. I don't have,

21 I didn't see the titles. I can't verify that sexual activity

22 was done with the animals or not.

23 Q. So it would be possible that for Can't Get Enough Dogs that

24 it's two consenting adults with a golden retriever in the

25 background?

1 A. **That's possible.**

2 Q. Okay, you stated that there is a field of customer commission

3 property, is that correct?

4 A. **That's correct.**

5 Q. What's the price range on those.

6 A. **It varies widely, simply because each performer has, you**

7 know, much like sex work, a performer could do a title,

8 perform a title for a longtime customer that's at a deep

9 discount because they know they are going to have future

10 work. So a custom production could be 30- to \$50 for

11 something short like smoking and could be 3- or \$400 for

12 eight, 10 hours of performing, you know, explicit sex acts.

13 So it varies by performer to performer, act to act, and film

14 to film. It's very difficult to determine what an average

15 range is because there really isn't one.

16 Q. That's fair. What's the most you've ever heard of on a

17 commission piece?

18 A. **The most I've heard of -- well, okay, that's another question**

19 with a lot of variables. If you're talking about, I'm trying

20 to think of her name. There's a Disney performer who has now

21 gone into, Annabella, I am sorry, I can't think of her name

22 right at the moment. She does, she charges \$30 for her

23 "Gamer Girl" bath water. And she makes \$1.2 million a month

24 on Only Fans doing non-hardcore, implied nudity-type stuff.

25 So I don't know that there is a top range or a

1 bottom range because it also depends on how well the

2 performer is known, if she's a cross-over celebrity say like

3 the Kardashians? I don't know what that top limit is simply

4 because of the nature of the industry and the fact that large

5 or big celebrities that have mainstream appeal are now in the

6 pornography industry.

7 Q. Is there a general trend line towards commission pieces being

8 more expensive for the more niche field that it is?

9 A. **It depends on the niche field. It also depends on whether or**

10 not that field has mainstreamed itself. You know, in the

11 case of, let's say, let's go back to materials that depict

12 horror types of themes. They used to cost 3- to \$5,000 for a

13 custom film and they can be gotten now for 50. So it depends

14 on the individual niche, whether or not it's gone mainstream.

15 As you see in pornography with incest materials,

16 those have gone completely mainstream and can be gotten for a

17 dollar 99. So it depends on the niche, its popularity, the

18 timing of when it's done, and the performer that's doing it.

19 It's very difficult to determine value in these cases because

20 the goal posts continue to move.

21 Q. You stated that most of the replacement values were disc just

22 because VHS is relatively uncommon. Is that a fair

23 characterization?

24 A. **Let me, let me clarify that. I stated that I defaulted to**

25 disc when it was available simply because VHS is less and

1 less available. I don't think we even found a VHS in the

2 search.

3 Q. Would a VHS, the same title, would a VHS given its rarity

4 potentially have more value in the way that some vinyl albums

5 are worth more on the original vinyl than a CD?

6 A. **That's another good question. I haven't seen evidence of**

7 that. VHS, unlike vinyl, doesn't have a nostalgia

8 perspective to it insofar as vinyl does. Vinyl has gone to

9 sort of this type of hip collector type of perspective or

10 people collecting them consider them hip and radical, and so

11 forth. I haven't, not to my knowledge has VHS taken on that

12 kind of social appreciation. They are seen as antiquated.

13 And especially because tape deteriorates over time, if anyone

14 was utilizing VHS or kept their VHS, it's more likely they

15 would have converted those or tried to transfer those when

16 you could do that and still have the machinery or the

17 companies that would transfer VHS to disc. I don't know that

18 it has the same kind of appeal long term simply because of

19 the nature of its deterioration.

20 Q. Are there, so first pressing, the books have, have more

21 value. First editions have more value. Within the

22 pornographic community is there that type of delineation?

23 Let me rephrase it. Can there be that type of delineation?

24 A. **There can be if the performers are well known enough, say,**

25 like Jenna Jameson when she was at the height of her success

1 and they were signed by the individual performers that were  
 2 famous at the time.  
 3 Q. So like anything: If the artist signs it, it sky rockets in  
 4 value.  
 5 A. **Yes. Even in pornography, yeah.**  
 6 Q. But the same title that the 1990 VHS versus a 2005 DVD, there  
 7 shouldn't be no difference in value, all things being equal.  
 8 A. **It depends on, so when VHS was first coming out, especially**  
 9 as it was in the era that it was most consumed, the  
 10 production companies in the mainstream productions when they  
 11 would sell these titles for 5- to \$10 because they were mass  
 12 produced and the stores would mark them up to between 50 and  
 13 \$75. So the markup on the part of the retail companies was  
 14 very high. That started to diminish even in spite of DVD  
 15 releases simply because the streaming world became more and  
 16 more common and consumers could find material online for, you  
 17 know, a dollar 99 a minute. Or, or, you know, 12.99, whereas  
 18 they would pay a much higher rate in the store.  
 19 So I would have to say that the VHS at the time  
 20 would cost more simply because of the way the market was and  
 21 I don't know that the DVDs would be as, they would cost as  
 22 much simply because of the rise of online streaming. Are  
 23 there exceptions to that? Possibly. But I think the nature  
 24 of the online streaming diminished even DVD sales.  
 25 Q. Were any of your replacement values based on streaming and

1 not physical media?  
 2 A. **When we were, when I wasn't able to find a tangible, physical**  
 3 item to replace a title with, I defaulted to the next  
 4 available streaming product which I took it it was, you know,  
 5 say if I could find a DVD for 1999 and I found the same film  
 6 for streaming for 14.99 or 12.99, I would default to that.  
 7 Q. You would default to the streaming in situations where you  
 8 found both the DVD and the streaming, correct?  
 9 A. **No, when I couldn't find the DVD.**  
 10 Q. Okay, so your process of valuation, it would be DVD, then  
 11 streaming, then VHS?  
 12 A. **VHS wasn't found.**  
 13 Q. Okay, so if not DVD, then streaming. If not streaming, a  
 14 zero dollar value. Is that fair?  
 15 A. **Not in all cases, no.**  
 16 Q. In what cases would it be different and why.  
 17 A. **Well, if you look at the Excel sheet and at the report, there**  
 18 were titles that, let's see. One moment. Let me find an  
 19 example. I am sorry, my dog is whining in the background. I  
 20 apologize.  
 21 Q. We're not hearing it so no need to apologize.  
 22 A. **There were titles where the, the item itself was found. In**  
 23 other words, the title. So Sisters, uh, uh, let me go here.  
 24 Find the... On the sheet, K8210.85, No. 106 in line, lane,  
 25 line, lane, sorry, 498.

1 Q. You are a going a little bit fast. I want to get a chance to  
 2 scroll there. This would be 106, Sisters, zane, 1993?  
 3 A. **That's correct.**  
 4 Q. Okay.  
 5 A. **So while the title itself was found to have existed, it was**  
 6 discontinued and, therefore, I applied the average value that  
 7 I cited in the report as \$36 because I could find the title;  
 8 it simply wasn't available anymore but it had value because,  
 9 in my opinion, it was still able to be appraised simply  
 10 because it was still noted online as having been in  
 11 production and having been previously available.  
 12 Q. So this would be, if we are going to use Sisters as an  
 13 example, this was shot and the company either went out of  
 14 business or burnt down, or whatever, and all of the original  
 15 copies were lost and it's functionally a lost film. Is that  
 16 fair?  
 17 A. **Yeah, um-hum.**  
 18 Q. So those were given a default of \$36. Correct?  
 19 A. **When they could be found, they are given an average of \$36 in**  
 20 value, yes.  
 21 Q. Now do you have an example where you were unable to find the  
 22 DVD but you were able to find streaming prices?  
 23 A. **Let me look. I really am sorry.**  
 24 Q. No, no, you're doing great.  
 25 A. **She's just like trying to take the door down here.**

1 Q. We can take a break if she needs to go outside or --.  
 2 A. **No, she was just out. So if you look at Taboo 12. Line 387.**  
 3 No. 7, Taboo 12.  
 4 Q. I've got that.  
 5 A. **Okay. So in this case, we couldn't find the DVD and**  
 6 therefore, we used the price that was available at the time.  
 7 Now like I said at the top of this, that market fluctuations,  
 8 anything can change, right? I lost my place.  
 9 Q. 387.  
 10 A. **Yeah, 387. That we defaulted to the streaming price which**  
 11 was available at that time which was \$4.88.  
 12 Q. Does the streaming price change based on search popularity,  
 13 or every time someone buys it, it goes up like the stock  
 14 market? Or is streaming price relatively static?  
 15 A. **Streaming prices flux.**  
 16 Q. Based upon what?  
 17 A. **In this particular case, the market will charge more for more**  
 18 popular downloads and charge less for less popular downloads,  
 19 so they are more attractive to consumers with an older title  
 20 on them.  
 21 Q. If we look at 387 as just an example, we have it at 4.88 but  
 22 the film is almost 20 years old. Is that price likely to  
 23 change or if we log on today it might be an \$8.00 download  
 24 instead of \$4.00?  
 25 A. **I think the change would be small. For instance, you know, I**

1 listed 4.88. It's being listed at \$5.00 and then another  
2 source it's \$8.00 so I think the change, if it would occur,  
3 would probably be minimal.  
4 Q. Okay, and do you know how many streaming titles, not DVD  
5 titles were valued out of the approximately 900 titles,  
6 closer to 850 titles that you listed?  
7 A. **I don't have that number off the top of my head.**  
8 Q. Would that be easy to find or would that be 15 minutes of us  
9 all looking at our watches?  
10 A. **I think it would be longer than 15 minutes, yeah. Probably a**  
11 couple of hours.  
12 Q. Is it going to be easy for you to do or is it going through  
13 and you counting and tallying.  
14 A. **(No response).**  
15 Q. Did my question go through or am I muted?  
16 MS. VANDERBROEK: Are you asking me a question?  
17 Q. No, I'm sorry, Dr. Hartmann, would that be an easy total to  
18 come up with or would that be exhausting to come up with.  
19 A. **I'd have to spend at least a couple of hours going back to**  
20 the database and reviewing the links to make sure that, you  
21 know, I could do an accounting of DVD versus streaming.  
22 Q. Can you give a ballpark? Is it, you know, one, ten, a  
23 hundred, just a ballpark. And no one is going to hold you to  
24 that number.  
25 A. **I don't even have a ballpark, I apologize.**

1 Q. The streaming titles were these closer to clips or were these  
2 closer to film length?  
3 A. **It appeared as though they were closer to film length so they**  
4 were making that available by film. If you see a clip,  
5 that's usually in the \$1.99 range. But if you see a film,  
6 that can change anywhere from 5 to \$15.00.  
7 Q. So there would be a significant amount of band width to  
8 replace all of these films that were streaming to download  
9 them?  
10 A. **How are you defining band width?**  
11 Q. The actual person logging onto the computer going to, you  
12 know, what I'm looking at 397 -- I've lost it. But, you  
13 know, going to adultfilmcentral.com and downloading a clip,  
14 it's going to use a significant amount of a person's internet  
15 to download a bunch of these films. Is that fair?  
16 A. **I think it depends on the type of internet connection they**  
17 have. If they use it on their phone, they will use up their  
18 data. But if they are on an internet range package of 50- to  
19 \$70 a month, I don't know that it would constitute a high  
20 amount of band width within those types of packages because  
21 cable companies don't really charge by band width anymore.  
22 They charge by, you know, how open your pipe is or not.  
23 So, like I said, I'm troubled with the language  
24 because a lot of companies don't charge by band width  
25 insomuch as they do in the openness of the pipe that you're

1 buying. You're either buying T1 or you're buying something  
2 you do social media with and it costs you \$24.95 a month with  
3 cable.  
4 Q. Well, let me rephrase it then: Given the speed of the  
5 download, what would be the approximate film size of a  
6 75-minute film?  
7 A. **Depends on the compression rate. If you have, you know,**  
8 something that's 1040P or 4K, the size is gonna be much  
9 larger than if you have something that's compressed down to  
10 say, you know, 256 or a, you know, something that's other  
11 than 16 by 9. It really depends on the compression rate of  
12 the video so I, I can't really assess. It would, like I  
13 said, it depends on in what format the video is being  
14 downloaded. 4K? Or old school on the average low resolution  
15 website.  
16 Q. Let me try asking this question a different way. Dr.  
17 Hartmann, I think you and I are approximately the same age,  
18 so --  
19 A. **No, I think you're much younger than I am. I'm 51.**  
20 Q. Well, that is a most surprising answer. I had you in your  
21 mid to late 30's. This experience will be even more  
22 appreciated by you. You must remember in the early days, the  
23 days of the mid to late '90s taking overnight to download a  
24 four-minute MP3 and now it takes about two seconds to  
25 download a four-minute MP3.

1 Based on your expertise and having gone through  
2 this list which I haven't and I doubt Ms. VanderBroek has  
3 clicked on each one of these links, how long would each of  
4 these videos take? Would it be something that on an average  
5 person's internet connection they are able to download the  
6 film in a few minutes or am I going to be running my computer  
7 for weeks downloading all of these films?  
8 A. **I would, and me not being a network, an IT person, I want to**  
9 preface it with that not being an IT person, I'm hesitant to  
10 even give a kind of a ballpark because I don't really know.  
11 An hour long video, well, let me use regular video as an  
12 example. If you're streaming something, it's instantaneous  
13 so you click on the link and it plays. If you are  
14 downloading it, depending on your internet connection,  
15 depending on the server that it's on, it can take five  
16 minutes or it can take an hour. There's a lot of variables  
17 here.  
18 Q. Okay, if you click on any of these so I'm looking at line  
19 852, Pyromaniac. It's discontinued, but I'll just use that  
20 as an example. If I click through that and it was a  
21 streaming one, is it going to say this is a 5 gigabyte file?  
22 Or is that not information that's generally contained within  
23 the block of text about the film?  
24 A. **Right. That's also a good question. It depends on the**  
25 website. On websites that are geared towards download, which

1 less and less sites are because of copyright issues, they  
 2 will have a list or they will have probably some kind of  
 3 listing of the, the size of the file. Streaming sites are  
 4 less likely to do that simply because they have, you know,  
 5 methods in place to prevent download because of copyright  
 6 issues and, you know, things of that nature. So it depends  
 7 on the website.

8 Q. So it sounds like most of the titles for which you were  
 9 unable to find DVD prices, they would be of the streaming  
 10 versus the download a clip variety. Is that fair? If I  
 11 understand the, the difference?

12 A. **Well, let me go to one and find out.**

13 Q. I'm not trying to get lost in the details. I'll let you know  
 14 where I'm going as soon as you answer this question.

15 A. **I would say the more expensive the title or the higher the**  
 16 appraisal, the more likely it's downloadable; the lower the  
 17 cost the more likely it is streaming.

18 Q. And if it's streaming, it's only available to be viewed on  
 19 the computer versus if the plaintiff had purchased it on VHS  
 20 or DVD where he could pop it into any T.V. that's set up for  
 21 that format to play. Is that correct?

22 A. **Well, that depends on if he has some kind of like a computer**  
 23 program, say as an example, Wondershare UniConverter, you can  
 24 put, and others of that nature, you can put the URL into  
 25 converters of that nature and download materials that are

1 streaming. I'm not saying that's, you know, a fast way to do  
 2 it but you can do that. Or people have sometimes done that  
 3 where they can download it through a converter.

4 Q. And then the downloading eventually to replicate it to --  
 5 strike that. Let me rephrase and start over.

6 Theoretically, if the plaintiff purchased a title  
 7 Film X on DVD and it was lost and you were unable to find a  
 8 DVD replacement but you were able to find a digital, there  
 9 would be additional costs after downloading the film to put  
 10 it back into that original state with in terms of burning it  
 11 onto a DVD. Is that correct?

12 A. **Well, it seems to me that you would have to pay for a**  
 13 converter once so I don't know that that would be considered  
 14 ongoing costs. It would be one cost for all in that sense  
 15 because you buy the program once and they average \$50 and  
 16 then if you wanted to burn onto another DVD or disc, then it  
 17 would be the cost of the discs which I don't know what they  
 18 cost. Maybe a dollar apiece, \$.50 apiece? I don't know.

19 Q. So it would be fair to say there are marginal additional  
 20 costs to convert the digital copies into a physical media  
 21 copy. Is that correct?

22 A. **I'd say minimal cost.**

23 Q. Is there value in the box art or the physical storage device  
 24 within the pornographic community?

25 A. **Considering that a lot of that box art isn't available online**

1 with the type of vendors that sell this material, again I  
 2 come back to if it's signed by a particular famous performer  
 3 at the time, it has value. But because it's available in  
 4 digital format along with the video itself, not likely.

5 Q. Okay. I asked this question about the number of streaming  
 6 and you said it would be a little bit of leg work; do you  
 7 know how many were given the value of \$36?

8 A. **Off the top of my head, I don't have that number.**

9 Q. Okay. Was it a lot or -- I am sorry, I didn't hear what you  
 10 said; we talked over each other.

11 A. **I said -- I lost my place here again. Spreadsheets and I**  
 12 aren't good friends. I don't think there were too many. It  
 13 wasn't a significant amount. There are a few but it wasn't  
 14 significant.

15 Q. But it's entirely possible that the clips for which you know  
 16 it existed but were lost, the \$36 placeholder value could be  
 17 significantly lower than the actual market rate, given the  
 18 limited supply.

19 A. **Well, that's, you know, largely why I took an average of I**  
 20 think nine or 10 of the most common prices.

21 Q. Are there the, the VHS -- strike that. Let me try again.  
 22 The DVDs that were produced by the porn industry,  
 23 did those have protections against copies on them the way  
 24 that if I bought a DVD today that I couldn't just stick it  
 25 into a DVD burner because there's protections on it?

1 A. **I would have to say that depends on who's producing the**  
 2 material. If you have someone that's a smaller player, they  
 3 might not have had the resources to put some kind of  
 4 copyright protections on them. Some of the bigger players  
 5 may have, so I think that's variable.

6 Q. In your experience with the production companies on  
 7 plaintiff's lists, were those smaller, larger, or spread  
 8 throughout?

9 A. **They seemed spread throughout. Predominantly, well, they**  
 10 seemed spread throughout because at the time you had three  
 11 big players which were Wicked, Vivid, and Caballero; then you  
 12 had smaller ones, VCA, and so forth. So it varied.

13 Q. And I'm almost positive --

14 A. **And not to interrupt, but I, I don't have the kind of**  
 15 background in really knowing when copyright protections were  
 16 placed on DVDs, so I don't have expertise in that area.

17 Q. I am referencing what has previously been marked as Hartmann  
 18 Exhibit 1. This is also Plaintiff's Motion in Opposition to  
 19 the Summary Judgment, Exhibits 5 and 6, of which one was  
 20 called Receipts of Property and one was called List of  
 21 Missing Items. Do you have those, Dr. Hartmann, or do you  
 22 want me to share my screen with you?

23 A. **I have them. Let me go back to that file. Okay.**

24 Q. I'm just scrolling through. It looks like there was about  
 25 1500 titles between the two, on each of the two exhibits or

1 on each of the two separate .pdf's that we've combined for  
2 purposes of this deposition to one. Correct?  
3 **A. It appeared to be that way initially, yes.**  
4 **Q.** And are those 1500 titles, are they the same between the two  
5 lists?  
6 **A. They were duplicates.**  
7 **Q.** Were they mostly duplicative or were there just a handful of  
8 duplicates?  
9 **A. Upon inspection, it seemed as though they were mostly**  
10 **duplicates.**  
11 **Q.** Okay, so we can use, so we can say so there were at least  
12 1500 unique titles.  
13 **A. I think we came up with the total of 600, let's see, 700,**  
14 **seemed to be 700, roughly 750 because of the duplicate nature**  
15 **of the two documents.**  
16 **Q.** So I'm looking at page 2 of what I had marked as Exhibit 5  
17 and that starts with Item No. 1591, Awesome Assets, (1987 4  
18 play), which plaintiff had marked at \$18. Are you looking at  
19 that?  
20 **A. Yup.**  
21 **Q.** So if we scroll down a few, he has Bible Black, disc 1; Bible  
22 Black, disc 2; Bible Black, disc 3. Now I know you weren't  
23 able to find Bible Black but I'll use it as an example.  
24 He has it list ed as three separate items, but when  
25 you did the valuation those would be one item, correct?

1 **A. No, those were three so I listed them individually and Black**  
2 **Bible, Bible Black were each valued separately.**  
3 **Q.** Then I'm confused how we went from 1500 in each of these two  
4 lists to the 750 on your spreadsheet. It seems like we lost  
5 750 titles somewhere.  
6 **A. It seems upon inspection that the items that bear Exhibit 5**  
7 **was the list of items. And Exhibit 6 were what was, whether**  
8 **or not it had a receipt, but they were the same.**  
9 **Q.** But there's still -- on either Exhibit 5 or Exhibit 6 there's  
10 about 1500 items, correct?  
11 **A. According to the accounting, we listed, I listed them all and**  
12 **there were 750.**  
13 **Q.** I'm not doubting your numbers; I'm just scrolling through and  
14 I'm confused because as I look through Exhibit 6, I'm  
15 scrolling down and I see 1 through 1500 -- 1 through 1605,  
16 and I guess I'm just looking for an example of, and if you  
17 have one, that's great and if not, so be it, where you  
18 condensed multiple items on the Plaintiff's submitted list  
19 onto one item on the valuation sheet.  
20 **A. We listed what, I listed what was on Exhibit 5.**  
21 **Q.** Okay.  
22 MS. VANDERBROEK: If I could interject? Miles, if  
23 you are looking at the first page of what you marked as  
24 Exhibit 5? So 1591 and then 1519. And then there is some in  
25 the 1500's. And then it skips 1400's entirely and goes to

1 1355. And then it does a few of the 1300's and then it goes  
2 to the 1200's. So it's not a, the numerical list is not a  
3 sequential numerical list.  
4 BY MR. GREENGARD:  
5 **Q.** So as I scroll through Exhibit 5, I don't see anything listed  
6 in the 1100's and I'm scrolling through it a handful of times  
7 now making sure I'm not going to have to eat my words on  
8 this. I see 1000; I see 1300, and I see 1500.  
9 So if I scroll into the 1100's on Exhibit 6, I'm at  
10 the bottom of Page 31 of Exhibit 6:  
11 1209: Over the Counter.  
12 1208: Oriental Blue.  
13 1207: My Play Thing.  
14 1206: Girls Craving Girls.  
15 None of those four were on your valuation sheet.  
16 Is that correct, Dr. Hartmann?  
17 **A. I would have to look at the valuation sheet. I went by**  
18 **Exhibit 5.**  
19 **Q.** And why didn't you look at Exhibit 6?  
20 **A. Well, we did look at Exhibit 6 and it seems as though they**  
21 **were duplicates and so it wasn't referenced.**  
22 **Q.** So I just took Girls Craving Girls as an example, and I  
23 searched for it in the catalogue and I'm not finding it.  
24 But, you know, I didn't build this so it's entirely possible  
25 that I'm wrong but...

1 **A. I would have to go through the list again and see if I can**  
2 **find it. I'm not, I'm not, spreadsheets are a challenge for**  
3 **me, so I'd have to, you know, I can list stuff but searching**  
4 **is a little bit difficult so I would have to scroll through**  
5 **and do that.**  
6 **Q.** Okay.  
7 **A. And because they are not listed in, in alphabetical order, it**  
8 **would take a little bit of time.**  
9 **Q.** One second. How long did it take you to actually find all of  
10 these titles?  
11 **A. About 50 hours.**  
12 **Q.** Five zero.  
13 **A. Um-hum.**  
14 **Q.** And, and do you think it would take a committed user of  
15 pornography approximately that long to go through and find  
16 all these titles again and download it and restock the  
17 collection?  
18 **A. It would depend on the devotion of the individual who was**  
19 **going to download them. If they could devote all their time**  
20 **to it, possibly, but I don't know.**  
21 **Q.** Okay, and the, did your prices include shipping costs for the  
22 physical media?  
23 **A. It did not.**  
24 **Q.** And what's the shipping cost if, if someone were to go out  
25 and buy, you know, one of these DVDs? Is this something like



1 as seen on T.V. where they really get you on the shipping or  
 2 is it going to be closer to Amazon where it's, you know,  
 3 \$2.00 or whatever?  
 4 **A. It depends on the vendor; I would say that they could offer**  
 5 anything from free shipping, to whatever ZIP code they are  
 6 shipping it to they would charge based on USPS or even UPS  
 7 fees. Depends on the vendor.  
 8 **Q.** So shipping could significantly add to the price of replacing  
 9 the collection?  
 10 **A. For shipping? Possibly.**  
 11 **Q.** Okay. Are the, is this, is the, to harp on the shipping, is  
 12 this similar to an Amazon experience where if I buy a book, a  
 13 movie, and a set of copper plates it's all coming from one  
 14 Amazon warehouse and it's all gonna come in one box, or is it  
 15 more similar to E-Bay where if I'm buying three items it's  
 16 coming from three separate places so I might have to pay  
 17 shipping on each of those three items rather than, than one  
 18 boxful of items? Does that make sense or shall I can  
 19 rephrase it?  
 20 **A. It makes sense. It makes sense. The logistics of shipping**  
 21 with respect to vendors of pornography or online  
 22 marketplaces, I don't have experience in the logistics. I  
 23 can tell you what it used to be back in the '90s but that  
 24 wouldn't be applicable here.  
 25 **Q.** So when you were going through and spending your time

1 compiling this list, you didn't see something that it's like,  
 2 you know, buy as many DVDs as you want and pay one flat rate  
 3 shipping, or it's like pay plus \$4.99 for shipping and  
 4 handling for each of these DVDs. You just have no knowledge  
 5 either way.  
 6 **A. It wasn't something I was looking at.**  
 7 **Q.** Okay. That's fair. Are the physical media, are those used  
 8 or are they new?  
 9 **A. I don't know the logistics of the companies. I would assume**  
 10 that they got like a parcel or a pallet of printed or  
 11 recorded materials that came from the distributor or the  
 12 production house if the production house is still  
 13 distributing it. They buy them in bulk basically.  
 14 **Q.** Does pornography have a, is, is it like a car where it  
 15 doesn't matter if you've driven it one mile, it plummets in  
 16 value once it's been used? Or regardless whether it's new or  
 17 used, does it hold relatively the same value?  
 18 **A. It plummets. Unless it has something unique to it such as a**  
 19 particular performer, or signature, or what have you,  
 20 anything that makes it stand out significantly. But  
 21 generally, it plummets.  
 22 A caveat to that if, like I said before in my  
 23 testimony, if it's a popular download, sometimes the online  
 24 distributors will increase the price because it's more  
 25 popular. The market flux is based on demand.

1 **Q.** I have one standard question that I want to circle back to.  
 2 What other cases have you served as an expert on or you've  
 3 tried other pieces of litigation that you have provided your  
 4 expert opinion on?  
 5 **A. I have not.**  
 6 **Q.** So I want to look at exhibit -- I'm just going to call it  
 7 Exhibit 5 and Exhibit 6 so everyone has a clear reference.  
 8 And Exhibit 5 was the, it's titled Receipts of Property and  
 9 it has values of or suggested values or alleged values of the  
 10 property.  
 11 And then Exhibit 6 is a list of items that  
 12 plaintiff claims are missing. Would you agree that that's a  
 13 fair characterization of the two lists?  
 14 **A. Are you asking me?**  
 15 **Q.** Yes.  
 16 **A. Okay, as I understood the exhibits to be that Exhibit 5 was**  
 17 the complete list of the exhibits. And the List of Missing  
 18 Items defined whether or not there were receipts for those  
 19 items based on the definition of P-R-O-O-F-L-L or the lack  
 20 thereof.  
 21 **Q.** So if something on Exhibit 6 said, you know, that the title,  
 22 you know, Girls Gone Wild and then it said "Proof but no  
 23 receipt," you would not have valued that, correct?  
 24 **A. Exhibit 6 was, as I understood it, was either had receipts or**  
 25 didn't. So I based my valuation on, on Exhibit 5.

1 **Q.** So if something didn't have a receipt, you wouldn't have  
 2 valued it, correct?  
 3 **A. I would have valued it, yes.**  
 4 **Q.** If it did not have a receipt.  
 5 **A. Yes. I would have valued it.**  
 6 **Q.** And what if it did have a receipt?  
 7 **A. I would also have valued it. The methodology would have**  
 8 remained the same. Any of the titles, whether they had  
 9 receipts or not because there were some prices that were  
 10 listed or assumed on the part of the Plaintiff, I would  
 11 value the list regardless of whether or not it had a  
 12 receipt.  
 13 **Q.** So if something is -- when would you not have valued  
 14 something that was in Exhibit 6?  
 15 **A. Well, like I said, Exhibit 6 appeared to be a duplicate list**  
 16 so I based my appraisal on Exhibit 5.  
 17 **Q.** So if something was in Exhibit 6, it should have been valued.  
 18 Is that a fair assessment?  
 19 **A. If it wasn't a duplicate, that's correct.**  
 20 **Q.** Okay. So if you bring up Exhibit 6, and I am going to share  
 21 my screen so that we can all see what I'm looking at.  
 22 Theoretically, I did this correctly, I'm on Exhibit  
 23 6 and I'm at the end of the 1100's. I'm at the beginning of  
 24 the 1200's. Can you see that, Dr. Hartmann?  
 25 **A. I'm scrolling. One moment. You're where now?**

1 Q. I'm on Page 31 of Exhibit 6. I also have it on my screen.  
 2 Anne, are you there, too, so I can proceed?  
 3 MS. VANDERBROEK: I'm here.  
 4 BY MR. GREENGARD:  
 5 Q. You see where it says Screw My Husband Please, 1 through 5.  
 6 We would all agree that that's there?  
 7 A. **What number is that?**  
 8 Q. 1199 through 1203 that's on Exhibit 6, page 31.  
 9 A. **1199. Okay.**  
 10 Q. Do we all see that? So Screw My Husband Please, 1 through 5,  
 11 those should have been valued if they were on Exhibit 5.  
 12 Correct?  
 13 A. **That's correct.**  
 14 Q. And what if they weren't on Exhibit 5? They wouldn't have  
 15 been valued. Is that correct?  
 16 A. **They would not be in this list, no.**  
 17 Q. And they would have value, correct?  
 18 A. **That's correct.**  
 19 Q. Okay. So if Screw My Husband Please, 1 through 5, are not on  
 20 this Exhibit 5, they're not going to be on your valuation  
 21 sheet. Correct?  
 22 A. **That's correct.**  
 23 Q. Okay. So when I hit Control F and I searched "screw,"  
 24 there's only one title with "screw" in Exhibit 5 and it's  
 25 Girls Who Screw Girls.

1 Would you agree with that, Dr. Hartmann?  
 2 A. **I'm not at that place on the spreadsheet.**  
 3 Q. Well, I'm just flipping through between Exhibit 5 and 6. And  
 4 Exhibit 5 only has Girls Who Screw Girls with the title word  
 5 "Screw" in it. Would you agree with that?  
 6 A. **Oh, hold on. Let me go back to that. I see that.**  
 7 Q. And there's, there's no other "screw," so it's not going to  
 8 have what we saw as Screw My Husband Please, 1 through 5.  
 9 Would you agree with that?  
 10 A. **Yes, it would appear as that, yes.**  
 11 Q. Okay. So we could say if Screw My Husband Please, 1 through  
 12 5, was not on Exhibit 5, then it's probably not on your  
 13 valuation sheet. Is that correct?  
 14 A. **That would be likely.**  
 15 Q. Okay. And just so that we can double-check this, I've got in  
 16 the search feature up here "screw," and we see Girls Who  
 17 Screw Girls which we just saw on Exhibit 5. And we see Girls  
 18 Who Screw Girls there, but we don't see Screw My Husband  
 19 Please, 1 through 5.  
 20 Would you agree with that?  
 21 A. **That appears to be missing.**  
 22 Q. So there could be potentially, you know, we saw just five  
 23 titles right now that weren't on the valuation sheet, but  
 24 there could potentially be many more that were listed on  
 25 Exhibit 6 but weren't listed on Exhibit 5. Is that correct?

1 A. **The valuation would be the same. That would be correct.**  
 2 Q. Okay, but the valuation sheet, the Excel sheet that I have up  
 3 right now is missing whatever would be in Exhibit 6 but not  
 4 in Exhibit 5. Is that correct?  
 5 A. **Potentially, yes.**  
 6 MR. GREENGARD: Okay. No further questions. Anne,  
 7 do you have anything?  
 8 MS. VANDERBROEK: I don't think so.  
 9 MR. GREENGARD: Then I'm fine going off the record  
 10 if you are.  
 11 MS. VANDERBROEK: Yes.  
 12 (At 3:00 p.m., the deposition concluded.)  
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## 1 CERTIFICATE

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ARLENE M. WRIGHT, CSR-0034, RPR, FCRR  
 Notary Public, Kent County, Michigan  
 My commission expires: 2-18-26  
 Dated this 1st day of February, 2021



## Deposition 2

David Werking Deposition

1

U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DAVID ELLIOT WERKING,  
An Indiana Resident, Case No. 1:19-cv-276  
Plaintiff, Hon. Paul L. Maloney  
v  
BETH EILEEN WERKING, and  
PAUL MICHAEL WERKING,  
Michigan Residents,  
Defendants.

ZOOM DEPOSITION OF: DAVID ELLIOT WERKING

DATE: January 29, 2021  
TIME: 10:05 a.m.  
LOCATION: 1715 East Princeton Avenue  
Muncie, Indiana  
REPORTER: Lori J. Cope, RPR, CSR-4113  
Appearing remotely from Newaygo County, Michigan

2

REMOTE APPEARANCES:

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## I N D E X

WITNESS: PAGE  
DAVID ELLIOT WERKING  
Examination by Ms. VanderBroek 5  
Examination by Mr. Greengard 17  
Re-Examination by Ms. VanderBroek 28

## E X H I B I T S

NO. PG. IDENTIFICATION  
1 1-1-18 Email String Re Dream  
2 1-1-18 Email String Re Dream with Attachments  
3 12-30-17 Email String Re Dream  
4 1-1-18 Email String Re Dream  
5 List  
(Exhibits 1 through 5 were marked digitally after the deposition)  
(Plaintiff's Exhibit 5 and Exhibit 6 to the Motion in Opposition were referenced and attached)

4

January 29, 2021  
Muncie, Indiana  
10:05 a.m.  
\*\*\*  
THE REPORTER: My name is Lori Cope, certified stenographic reporter and notary public in the State of Michigan. This deposition is being held via videoconferencing equipment.  
The witness and reporter are not in the same room.  
The parties and their counsel consent to this arrangement and waive any objections to this manner of reporting. Please indicate your agreement by stating your name and your agreement on the record and please announce anyone else in the room with you.  
MR. GREENGARD: Attorney Miles Greengard, and I am fine with that. No one else in the room.  
MS. VANDERBROEK: Attorney Anne VanderBroek. No one else in the room. I'm fine with that.  
THE REPORTER: Mr. Werking, do you have anyone in the room with you?  
MR. WERKING: No, I have no one in the room, and I agree with that.  
DAVID ELLIOT WERKING,  
after having been remotely sworn,  
was examined and testified as follows:

## EXAMINATION

BY MS. VANDERBROEK:

Q. Okay. Mr. Werking, thank you for being with us here today. I can start with kind of summarizing where we -- how we got here. Now, you lived with your parents in Michigan until a domestic dispute made you leave. Correct?

A. **I lived with my parents off and on. I moved in the -- I did a** short stint with them at the beginning of the divorce, that would have been about -- from February until about -- I'm going to say around June I left, and then I came back after the divorce to live with them.

Q. Okay. When you left after the divorce, the most recent time that you have lived with them, when you left that time, it was because of a domestic dispute. Correct?

A. **Yes, there was a -- there was a -- there was an altercation, a** physical altercation, and I was requested by the police officers to leave --

Q. Okay.

A. **-- for three days.**

Q. And when you left that last time, you left the state, you moved to Indiana, and you left all of your stuff with your parents. Correct?

A. **Well, after the three days I tried to get it back, but they** wouldn't let me on the premises with my PODS or anything else, so I left the state, yes, after that.

Q. Now, at that time, because you left it with your parents, it was property that was being held by somebody else for you at that time. Now, do you currently have any property that is being held by anybody else for your benefit?

A. **I have no property that is being held by anybody else for my** benefit right now.

MR. GREENGARD: I'm not sure if the court reporter picked it up, but I am going to object to that on the basis of relevance.

BY MS. VANDERBROEK:

Q. Okay. Had you been warned about bringing pornography into the house before you moved in with your parents the last time?

A. **I -- when I was under the age of 18 I remember borrowing a** porn VHS from my friend Brent down the street, and they destroyed it, and they said a lot of things.

Q. Okay.

A. **I'm not sure if that was one of them, but when I came back I** made sure to have a verbal contract that my belongings would not be destroyed.

Q. I'm going to share my screen with proposed Exhibit 1. Can you see this? It's an Adobe document that looks like an email.

A. **Uh-huh.**

Q. Do you recognize that you sent emails to your father back and forth?

A. **Yes, I sent -- I sent emails to my father.**

Q. Okay.

MR. GREENGARD: Can we go off the record for a second? I want to chat with Anne about something.

THE WITNESS: Okay.

(Off the record 10:10 to 10:11 a.m.)

BY MS. VANDERBROEK:

Q. So this, this particular email, was a chain with your father as you can see. Hold on a second. How do I move this thing? You can see his email addressed to you on January 1st. Is that correct?

A. **That's what it says. I'm not sure that that's right, but I** have -- I'm not going to go check it right now.

Q. Okay. What I'm particularly looking at is this section where your father is talking about your past history with selling pornography, with him destroying that pornography that you talked about from high school. Do you recall those events?

A. **Yes.**

Q. And did you sell pornography in the past?

A. **No.**

Q. Why would your parents believe you had?

MR. GREENGARD: Objection, calls for speculation, and objection on relevance.

But you can still answer that, David.

A. **Could you repeat the question?**

BY MS. VANDERBROEK:

Q. In your opinion, why would you think that your parents believed you to be selling pornography?

A. **Because they are trying to get away with stealing my** possessions.

Q. This is back in high school that I'm talking about in particular. They are talking about you had a past of selling pornography when you were in high school.

A. **I never sold pornography in high school. I bought a Playboy** from a friend, but I didn't sell pornography.

Q. Okay. In these emails with your father your email address, I can find it here, is showing as omik2omik2@hotmail.com. Is that correct?

A. **Yes.**

Q. Is that your email address now?

A. **That is my email address now.**

Q. Would you say that is a fairly unique email address, or is that a fairly common email address?

MR. GREENGARD: Objection, calls for speculation.

BY MS. VANDERBROEK:

Q. Have you seen any other email addresses that are similar to your email address?

A. **I -- I don't know.**

Q. Where did you come up with the idea for that email address?

MR. GREENGARD: Objection, relevance.

BY MS. VANDERBROEK:

1 Q. In your interrogatories you were asked whether you had any  
 2 knowledge of the site Hornbunny. Do you recall that?  
 3 A. **Yes.**  
 4 Q. And you answered that you had no such knowledge. Is that  
 5 correct?  
 6 A. **That is correct.**  
 7 Q. Okay. When we did a Google search of your email address it  
 8 came up with a site Hornbunny for that email address. Do you  
 9 have any idea why that would be?  
 10 A. **I have no idea.**  
 11 MR. GREENGARD: Calls for relevance -- excuse me,  
 12 calls for speculation. My apologies.  
 13 BY MS. VANDERBROEK:  
 14 Q. Do you have a relationship with the website Hornbunny?  
 15 A. **I have never heard of them before.**  
 16 Q. What about the websites that you reference in Exhibit 3 I'm  
 17 showing now, YouPorn or xHamster, do you have a relationship  
 18 with either of those sites?  
 19 A. **I know they exist.**  
 20 Q. Do you buy or sell pornography on those sites?  
 21 A. **No.**  
 22 Q. Moving on to Exhibit 2, again, an email between you and your  
 23 father January 1st. In this one you are talking about the  
 24 items that were destroyed. Do you recall emails around that  
 25 subject? Do you recall this particular email where you said

10

1 there is -- you gave him a general list of the movies and the  
 2 albums and said that there were about 500 filled DVRs [sic]  
 3 and CD-Rs in there?  
 4 A. **I remember that, yes. That is incorrect though.**  
 5 Q. How so?  
 6 A. **At the time my wife, she had this thing, it's called Amazon**  
 7 **Prime**, and when you have Amazon Prime you can get free CDs and  
 8 movies on it. And I -- I would take the CDs and the DVDs and  
 9 I would put them on a disc so that I could watch them on the  
 10 TV. I wanted to watch it on the big screen TV.  
 11 Q. So you would pirate them?  
 12 A. **I didn't think of it as pirating it. I thought of as moving**  
 13 **it from one place to another without a -- without a cable.**  
 14 Q. Had you purchased the rights to those movies and --  
 15 A. **Well, Amazon does, and I had a bunch of -- I had a bunch of**  
 16 **these (indicating). These are -- these are free minutes, and**  
 17 **you get them when you buy DVDs and VHSes, and you go to the**  
 18 **website and they give you the free minutes, and then you go**  
 19 **and get -- get the movies to download.**  
 20 Q. So you buy the rights to the movies at that time?  
 21 A. **Well, I would assume if they are a company that is selling the**  
 22 **movies that they are also giving you the rights to the -- just**  
 23 **like Amazon, I mean.**  
 24 Q. Well --  
 25 A. **That's what I thought.**

1 Q. What does the R designation in CD-R and DVD-R mean?  
 2 A. **Recordable.**  
 3 Q. Okay. So that means you can take content from one medium,  
 4 say, streaming, and download it onto these discs. Correct?  
 5 A. **All -- so it wasn't -- some of those discs were free**  
 6 **compilations, people would send me compilations also when I**  
 7 **made purchases, but I wasn't -- I wasn't streaming it. I**  
 8 **would go to the websites and I would click the down- -- I**  
 9 **would use the minutes to buy it to download it.**  
 10 Q. So you were actually buying the titles, to clarify --  
 11 A. **Yeah.**  
 12 Q. -- or you were paying to access them via streaming?  
 13 A. **Well, there was only one way to do it, you know. It wasn't --**  
 14 **I don't think they would sell it streaming if you could**  
 15 **download the stream. I'm not a tech person.**  
 16 Q. I'm not familiar with the pornographic world. Do these cards  
 17 give you access via streaming where you can watch, or do they  
 18 give you the rights to own the content?  
 19 A. **They -- you use them and then they send you the link to the**  
 20 **movie, and then you put the movie on the disc using the**  
 21 **software that I got for free on the internet.**  
 22 Q. So you're essentially getting content you didn't pay for.  
 23 Correct?  
 24 A. **No, but -- but --**  
 25 MR. GREENGARD: Objection.

12

1 A. **Promotionals. They gave it to me. They said you have these**  
 2 **minutes for free.**  
 3 BY MS. VANDERBROEK:  
 4 Q. You have got 500 discs. It is a significant number of discs.  
 5 Is that a typical -- I mean, 500 discs --  
 6 A. **I only burned about 100 of them. The 400, they were all**  
 7 **compilations of like we want you to buy this, we are going to**  
 8 **send you a bunch of scenes from movies.**  
 9 Q. Moving on, you were requested to produce all of your receipts  
 10 for your purchases in the production request. Do you recall  
 11 that?  
 12 A. **I sent all the -- yes, I recall that.**  
 13 Q. You sent a few bank statements as -- in lieu of receipts.  
 14 Correct?  
 15 A. **Well, they said they wanted all of the receipts, so I sent**  
 16 **them every single piece of information I could.**  
 17 Q. Okay. Exhibit 4 I believe -- no, that is 3, that is 4 --  
 18 talks about a single receipt for upwards of \$11,000. Do you  
 19 recall this?  
 20 A. **Yeah.**  
 21 Q. Where is this receipt?  
 22 A. **That receipt is in D. Working evidence. It's a big folder and**  
 23 **it has -- oh, you mean on the -- I didn't -- I didn't buy that**  
 24 **with Chase. Chase is my new bank.**  
 25 Q. These are the responses to the production request you gave me.

1 **A. Right, but there was a big file that I sent to the police**  
2 officers that had all of the -- I can resend it to you if you  
3 need it.  
4 **Q.** You were asked to produce all receipts. You did not produce  
5 all receipts, so I am asking where they are.  
6 **A. I gave D. Werking evidence to Miles.**  
7 MS. VANDERBROEK: Miles?  
8 MR. GREENGARD: We can go off the record here and we  
9 can chat about this.  
10 (Off the record 10:22 to 10:26 a.m.)  
11 BY MS. VANDERBROEK:  
12 **Q.** I will skip my next question then, which is about the  
13 remainder of the receipts from Exhibit 6 that was in the  
14 initial pleading.  
15 In the interrogatories you were asked the name -- to  
16 produce the names of publishers, producers, et cetera of the  
17 titles so that Dr. Hartmann could better appraise them, and  
18 you did not produce those. There was an objection on those.  
19 I don't care about the ones that were able to be appraised,  
20 but for the titles that were unable to be determined,  
21 particularly because they were vague, I would like those. Do  
22 you have the producer, title, actors, et cetera, for those  
23 items?  
24 **A. All I have is my memory. We are -- we are years away from me**  
25 being able to do that.

1 **Q.** So, for example, the title -- VHS title Amateurs, there is no  
2 producer listed, there is no year listed, there is no further  
3 information than Amateurs, which was not --  
4 **A. That -- that's what was written on the disc, on the VHS copy.**  
5 That -- so I wrote down the title of the movie as it was  
6 written on the VHS itself.  
7 **Q.** Okay. Why did you create these lists?  
8 **A. I -- as someone with adult attention deficit disorder, I am**  
9 always making lists of -- because I never know -- you know, I  
10 want to be cognizant of the world around me. I have  
11 distractibility issues. I forget, I know I forget things, and  
12 it's a coping mechanism for me.  
13 **Q.** I'm not sure if Miles told you this, but when we talked to  
14 Dr. Hartmann yesterday she spoke of custom-commissioned films  
15 and that those were difficult to evaluate because of their  
16 unique nature. Were there any custom-commissioned films in  
17 your collection to your recollection?  
18 **A. No, I didn't make any -- I didn't have any custom films**  
19 done.  
20 **Q.** Okay.  
21 **A. I saw that one was semi custom. I just bought it. It was in**  
22 a box.  
23 **Q.** Okay. Are the lists that you created that Miles filed as  
24 Plaintiff's Exhibits 5 and 6, receipt of property and list of  
25 missing items, these are from the initial pleading, are those

1 exhaustive lists? Do those create every title in your  
2 collection?  
3 **A. Those, I wrote down everything I could remember. I'm sure**  
4 there is more movies. And, as I told Miles, there is more  
5 stuff in the house that they destroyed, but I just can't  
6 remember it. I didn't write it down. I -- I don't have that  
7 evidence.  
8 **Q.** Well, you spoke of your divorce attorney having some of these  
9 lists. When were these lists originally created, before or  
10 after the destruction?  
11 **A. Oh, before. They were -- these lists were created during.**  
12 When you get divorced you make a list of assets and debts, and  
13 they really want to know what's in your house. So I had just  
14 got kicked out, and they wanted it, it was fresh in my  
15 memory.  
16 **Q.** And so you made this, these lists, by going through your  
17 items, here is a video, here is the title, here is the video,  
18 here is the title, et cetera?  
19 **A. I -- I was -- my -- my wife, she was nice, she gave me my**  
20 journal back when I asked for my journal (indicating), because  
21 I keep my journal around to write down my memories and stuff,  
22 and it was already in there.  
23 **Q.** Okay. So there were a number of titles that were turned over  
24 to the Ottawa County Sheriff's Department this past -- a year  
25 ago fall, 2019 fall. A number of those titles were not

1 included in this Exhibit 5 and 6, specifically Mother Daughter  
2 Exchange Club films, Naughty Amateur Home Videos, Mother Son  
3 Secrets, Brother And Sister, Unnatural Sex, She Is Turning 18,  
4 Violation of Trina Mitchell -- or Michaels, Turning Up  
5 Teeners, Teen Babysitters. Would there be a reason that these  
6 titles were not included in your Exhibits 5 and 6?  
7 **A. Some of those were compilations. I didn't pay attention to**  
8 the compilations that people would send me. The porn  
9 companies, they would make these compilations. I didn't pay  
10 attention to the titles of that. You know, compilations, I  
11 know you are not a porn person, but compilations get passed  
12 around all of the time. There are really cheap to make. Lots  
13 of people get annoyed by them. So the -- there were a few  
14 that I had not remembered, and so I put those on the list then  
15 when -- when they reminded me. Again, it's like -- for me,  
16 memory is like if I touch it, I remember it, I can remember a  
17 lot about it. But when I'm away from it, when it's not, you  
18 know, in my everyday life, it's like, ooh, you know. I do,  
19 you know, so that I really -- I really rely on the lists a  
20 lot.  
21 **Q.** So if you rely on these lists, if these lists are as complete  
22 as you can make them, yet these items were left off of them,  
23 how do we know other stuff wasn't left off of them, or if  
24 things were not added where maybe you wanted them but didn't  
25 have them yet?

1 A. **I just did the best job I could.**

2 Q. Would you have put items that you -- that were your, quote,  
3 unquote, wish list on these, amongst these titles?

4 A. **No.**

5 Q. So it's your sworn testimony that every title on here you  
6 owned?

7 A. **Yes.**

8 MS. VANDERBROEK: Okay. That's all I have got for  
9 right now.

10 You are muted, Miles.

11 MR. GREENGARD: Thank you, Anne.

12 EXAMINATION

13 BY MR. GREENGARD:

14 Q. David, so I want to ask a few questions, you said something  
15 was semi custom. What is semi custom?

16 A. **That's what the lady who was doing the appraisal said about**

17 Lesbian Piss Party. She said it was semi custom. And I don't

18 know what it means, because I -- buying custom videos are

19 not -- are not a thing in my world. That's -- that's new

20 weird stuff. I am just buying the regular -- if it's \$30 and

21 it has got a box, a big box, and it has got a lady with a

22 weird perm and nails and -- you know, and it looks like it's

23 kind of cool, then I'm buying it.

24 Q. Excuse me. Okay. Were you buying the pornography because you  
25 enjoyed watching it for its sexual nature, or did you buy the

1 pornography because you enjoyed the set design and the corny  
2 dialogue and, you know, the makeup, or was it a combination  
3 thereof? In the same way that some people enjoy watching bad  
4 movies, not because they think the movie is good, but because  
5 it's fun to watch bad movies?

6 MS. VANDERBROEK: I am going to object on  
7 relevance.

8 BY MR. GREENGARD:

9 Q. Are you --

10 A. **Yeah. Well, yeah, I think I bought it for a couple reasons.**

11 I -- I enjoy cheese. I don't think of it as cheese. I think  
12 cheese as an art form. Cheese is something you are doing  
13 deliberately to draw humor into a situation, but nothing is --  
14 when -- when somebody is doing something -- hello --

15 Q. I hear you. You are good.

16 A. **Okay. When people are having an intimate expression of**

17 themselves, sometimes I feel like there is -- there is an  
18 honesty there that I find lacking in almost any kind of movie,  
19 and I find honesty lacking a lot in the world. And so I

20 value -- I really value honesty, and I really value being able

21 to be completely intimate and be completely -- you know,

22 baring it all to the world. I mean, that's a powerful

23 statement. Now, I would watch these things maybe once and

24 then I would put them away because some day I know that a

25 censor is coming to take it away.

1 Q. So you did not just enjoy -- you did not -- sorry. Let me  
2 rephrase that.

3 You did not only purchase the majority of  
4 pornographic material for arousal purposes, you also viewed it  
5 as art. Is that correct?

6 A. **Yes.**

7 Q. Okay. So there was a -- there was a question about a VHS in  
8 particular that the only information you had was Amateurs. Do  
9 you remember that question?

10 A. **Yes, I do.**

11 Q. Approximately how many of the videos; videos, DVDs -- the  
12 titles, we will use that term. Approximately how many of the  
13 titles were you less than confident in the name of?

14 A. **I was always very confident in the name of the titles.**

15 Q. So Amateurs is the exception, not the rule, that you were --

16 A. **Right.**

17 Q. Okay. Can you ballpark how many you weren't, you know,  
18 incredibly confident of the name?

19 A. **I was very -- I am very confident of all of the names that I**  
20 put down.

21 Q. Okay. There was discussion about the veracity of the lists  
22 that you added, and I want to -- I believe Ms. VanderBroek  
23 asked this, but I want to make sure that we get it down for  
24 the record. The exhibits, and I am going to share my screen,  
25 and this is always a

1 hold-your-breath-and-make-sure-I-don't-screw-it-up moment.  
2 This is Exhibit 6, a list of missing items, which have 500 VHS  
3 titles and about 1,500 DVD titles. And Exhibit 5, receipts of  
4 property, which has about 1,500. You are familiar with both  
5 of these exhibits. Is that correct?

6 A. **Yes.**

7 Q. You made these lists. Correct?

8 A. **Yes.**

9 Q. And is there anything on those two lists that you did not  
10 buy?

11 A. **No, I bought everything.**

12 Q. Is there anything on those two lists that you did not pay  
13 for?

14 A. **Well, I already listed the things as -- that were given to me**  
15 as gifts.

16 Q. Okay. And those, those were in responses to Ms. VanderBroek's  
17 interrogatories. Correct?

18 A. **Yeah.**

19 Q. Were there anything on there -- was there anything on there  
20 that you downloaded without paying for?

21 A. **Well, I already talked about the -- I mean, downloading**  
22 without paying for?

23 Q. Let me rephrase the question. Is there anything on there that  
24 you did not believe you had a legal right to obtain?

25 A. **No, I had legal rights. I believed that I had legal rights to**

1 obtain everything on that list.

2 Q. Did you go to any torrenting sites like BitTorrent or The

3 Pirate Bay to download any of those titles?

4 A. **No, I didn't. I didn't go to torrent sites at all. I like**

5 paying artists to do the job that they have been tasked by God

6 with.

7 Q. And did you go to any peer-to-peer sites like Limewire, Kaaza,

8 Napster in its heyday? Did you go to anything like that to

9 download those materials?

10 A. **No. No, sir.**

11 Q. So the only things on those lists that you didn't pay for you

12 were given -- you were comped them because you had purchased

13 other things through the production house. Is that correct?

14 A. **That's correct.**

15 Q. Okay. There was some discussion yesterday, and I realize you

16 weren't here, about titles involving animals. Were there any

17 titles involving animals in your collection?

18 A. **Yeah, I bought some titles involving animals --**

19 Q. Was --

20 A. **-- just to see what it was about.**

21 Q. Approximately how many titles was that?

22 A. **Eight or ten.**

23 Q. So it was a very small portion of the collection?

24 A. **Yes.**

25 Q. And how did you purchase those?

1 A. **I bought -- I had a punk magazine and it was in the -- in the**

2 back of one my punk magazines. There was an ad for Goosebumps

3 Graphix, and it was -- I -- and I wrote to them. This would

4 be in the olden days. You write letters and you get catalogs.

5 So I wrote a letter, I got a catalog there, and then, later

6 on, I used a credit card on some website.

7 Q. Okay. And you previously testified that you created Exhibit

8 5. This is Exhibit 5, what I have on my screen -- and let me

9 see if I can move this -- Exhibit 5 and Exhibit 6. You

10 created these two lists. Correct?

11 A. **Yes.**

12 Q. And what's the difference? What would you put in Exhibit 5

13 versus Exhibit 6? What is the difference between the two

14 lists?

15 A. **Scroll back to Exhibit 5, please. Receipts of property. And**

16 Exhibit 6 would be what? List of missing items. So the

17 difference is list of missing items and receipts.

18 Q. So let --

19 A. **There are some things I -- I know I don't have. The receipt**

20 would be the letter to my lawyer, and this, knowing that I

21 have it. I had -- I kept all of the receipts, but those

22 receipts got destroyed by the defendants.

23 Q. So if something is listed in Exhibit 5, it is also listed in

24 Exhibit 6. Is that correct?

25 A. **Yeah.**

1 Q. But if it's listed in Exhibit 6, it's not necessarily listed

2 in Exhibit 5. Is that correct?

3 A. **Right.**

4 Q. So, and this is confusing, and Ms. VanderBroek and I had a

5 tough time working through this with the expert yesterday, so

6 I just want to say this again, and I realized that I just

7 asked it, but I want to make sure we get it down because we

8 are all on the same page because you are the one that created

9 these lists. Everything on Exhibit 5 is on Exhibit 6, but not

10 everything on Exhibit 6 is in Exhibit 5. So Exhibit 5 is a

11 smaller subset of Exhibit 6. Is that correct?

12 A. **Yes.**

13 Q. Okay. And did you purchase everything on Exhibit 6?

14 A. **I purchased it? Yes, I purchased everything on Exhibit 6.**

15 Q. And there is about 500 VHSes. Is that correct? I'm sorry,

16 there is about 400 -- 428 VHSes on Exhibit 6. Does that feel

17 about correct, about how big your collection was?

18 A. **Yeah.**

19 Q. And you paid for all 428 of those, those VHSes. Correct?

20 A. **Right.**

21 Q. And there are I think it is 1,602 -- 1,605 -- 1,605 DVDs on

22 Exhibit 6. Did you pay for all 1,605 of those DVDs?

23 A. **Yes, I paid for all of those.**

24 Q. So that is just over 2,000 items all together, and you paid

25 for all 2,000 items?

1 A. **Uh-huh, yes.**

2 Q. And Ms. VanderBroek showed you --

3 MR. GREENGARD: And, Anne, if you want to point me

4 to which exhibit it was, it was about 500 DVDs and --

5 MS. VANDERBROEK: Yeah, that would have been Exhibit

6 2.

7 BY MR. GREENGARD:

8 Q. Let me bring that up. I stopped sharing my screen so you guys

9 don't see emails to other clients. An attorney did that on a

10 trial I was in, so I learned my lesson there.

11 Exhibit 2. Okay. David, I am showing you what

12 Ms. VanderBroek has previously marked as Exhibit 2. This was

13 an email to your father on January 1st of 2018. Do you

14 recognize this email?

15 A. **Yes, I do.**

16 Q. Okay. You talked about that a few minutes ago. And you

17 stated there were also about 500 -- excuse me, 500 filled

18 DVD-Rs and CD-Rs in there. And you typed that. Correct?

19 A. **Yeah.**

20 Q. Now, those 500 filled DVD-Rs and CD-Rs, are they listed in

21 Exhibit 6?

22 A. **I listed them down at the bottom under miscellaneous. I was**

23 thinking of it as miscellaneous stuff. I didn't want to

24 charge my parents for anything that -- because these

25 compilations they give you, they are really, really cheap, and



1 they are really -- you know, boy, they -- they sweat a lot,  
 2 you know, making those. They don't. I am just kidding. You  
 3 know, it's very silly, but they don't work very hard in making  
 4 them. Most of the time they don't work at all. But, you  
 5 know, I just -- I didn't want to charge them for it, but I  
 6 knew that, you know, if they sold them, they are worth  
 7 something, so I just said okay, well, let's charge them the  
 8 price for CD-Rs and DVD-Rs.

9 Q. So those 500 filled CD-Rs and DVD-Rs do not make up any of the  
 10 2,000 VHSes and --

11 A. **That's correct.**

12 Q. Okay. And were any of the 2,000 VHSes or DVDs, so that 2,000  
 13 and change, were any of those recordable copies, or were they  
 14 all received from a production house?

15 A. **Any -- any -- any DVD-Rs I bought were official DVD-Rs from**  
 16 the company. This is where it gets kind of tricky, because  
 17 Filmco at the time was going through, I know, a really bad  
 18 situation, and sometimes they would put things on DVD-Rs.  
 19 Now, that's not the way you should do things, but that's the  
 20 way that the company did things. So they would be officially  
 21 a DVD-R copy, but they are selling it as if it was a regular  
 22 DVD.

23 Q. Okay.

24 A. **So everything I bought was official and had the rights to it,**  
 25 just maybe not all on the right -- I mean, okay, to make -- to

1 print a regular DVD costs about \$140. To make a DVD-R, not  
 2 very much money. So, again, companies are going out of  
 3 business. They were trying to make whatever buck they can. I  
 4 am just trying to keep it alive.

5 Q. I'm sorry, I cut you off. You can keep answering that.

6 A. **That's fine. I am kind of -- I'm kind of zoning out, but**  
 7 that's all right. That's me. It's -- it's the morning.

8 Q. Well, I'm rounding third, so we are almost done. On the DVDs  
 9 that I am looking at, did most of these have copyright  
 10 protections on them such that you can't just throw it in a DVD  
 11 burner, or did most of these -- was it like buying a CD in  
 12 1995, that no one thought of that and you could put it in a  
 13 burner?

14 A. **I never thought of that. I didn't have a DVD -- I mean, I**  
 15 didn't have a -- I mean, I had a DVD burner on my laptop then,  
 16 but I didn't think about burning actual DVDs and seeing if  
 17 they would translate onto a DVD-R. I already had the DVD  
 18 copy. I wasn't trying to make copies of anything. And I  
 19 just -- I didn't need it, so I didn't try to figure it out.

20 Q. And were any of the 2,000 titles on Exhibit 6, were any of  
 21 those burned from a friend or a family member, or did you  
 22 purchase all 2,000 of those?

23 A. **I purchased all of the movies, yeah.**

24 Q. And then you testified that you would download things from  
 25 Amazon Prime or whatnot and then put them on -- burn them onto

1 a DVD so you could watch them on a TV. Is that correct?

2 A. **Yeah.**

3 Q. Did you ever sell those copies?

4 A. **No, I just -- I just -- I never sold them. I just wanted to**  
 5 watch them on the TV. I figured I -- you know, eventually,  
 6 you know, I would get the money, when I would get the money I  
 7 would buy a copy, and -- because I want to support the  
 8 artists, but right then I didn't have a lot of money. It was  
 9 very tight. I was trying to save save save because I was kind  
 10 of worried about the economy then. I still am. But, no, I  
 11 never thought of -- I thought about get- -- you know, I  
 12 thought about them as kind of trash. It's kind of like the  
 13 debris of the world.

14 Q. You had a legal right to watch those from an Amazon Prime  
 15 membership or a Netflix membership or whatever?

16 A. **Yeah, I had the legal rights to. I mean, it was my wife's**  
 17 account, and I was -- but it's both our money, so I was  
 18 using -- you know, so I thought it -- and she said oh, you  
 19 used my account, you used my account, because I never used  
 20 Prime.

21 Q. So on Exhibit 6 you estimated just about 29,000 you spent on,  
 22 money, and since then defendants have recovered a few boxes of  
 23 items. Do you stand by the most recent valuation, which is  
 24 just a shade under \$25,000, in terms of out-of-pocket  
 25 expense?

1 A. **Yeah.**

2 Q. Okay. And you put together a replacement cost of \$40,000,  
 3 which would trickle down to somewhere between 35 and 40 once  
 4 we account for those new materials -- or the rediscovered, the  
 5 found materials?

6 A. **Yeah.**

7 Q. Do you stand by that evaluation?

8 A. **Yeah.**

9 MR. GREENGARD: Okay. No further questions.

10 RE-EXAMINATION

11 BY MS. VANDERBROEK:

12 Q. I have got a few more to follow up.

13 You mentioned some of the receipts in -- or proof  
 14 that were listed in Exhibit 6 were in a letter to your lawyer,  
 15 but that you didn't have the original receipt. What do you  
 16 mean when you say a letter to your lawyer?

17 A. **I meant that my lawyer asked for this, for me to list**  
 18 everything that was in the house and divide it between you,  
 19 this is yours, this is your wife's, or this is both of yours.  
 20 So I made that list of assets and debts, and I put everything  
 21 on there because I didn't want her to go through and destroy  
 22 it all, because I know how women get when they are mad, so --  
 23 well, sometimes. I mean, you haven't seen my wife when she is  
 24 mad. Believe me. So I -- you know, I wanted -- that was the  
 25 list I made of -- of all of my stuff.



1 Q. And in that letter to your lawyer did you guesstimate the  
2 value, as you did in Exhibit 5, or did you actually have  
3 physical receipts or electronic receipts for those items?  
4 A. **Well, I remembered what I spent, and I remembered spending --**  
5 I -- it was a guesstimate, but it was a fairly accurate  
6 guesstimate.  
7 Q. But it wasn't based on actual receipts, it was based on your  
8 recollection of such?  
9 A. **It was -- yeah, every time there is a receipt my mind sees the**  
10 receipt (indicating).  
11 Q. So if I asked you -- every time you see a receipt your mind --  
12 you said you see that receipt. So if I asked you --  
13 A. **Well, yeah, if I go to Wendy's, if I see a receipt, I would be**  
14 like wow, that is 6 bucks, or I will remember that, that chili  
15 at Wendy's is, you know, 6 bucks. I will remember that.  
16 Q. So if I asked you, because you said that you see that receipt,  
17 on -- let me share my screen a second. If you are looking at  
18 Exhibit 6 to your original filing, this first title, Head  
19 Waitress, says PROOFLL after it.  
20 A. **Yeah.**  
21 Q. Your legend says that means it was in this letter to your  
22 lawyer. So do you recall, what did the receipt say that the  
23 value of Head Waitress was?  
24 A. **Well, I remember buying that from Excalibur Films, and I**  
25 remember that that was about 20 bucks.

1 Q. So you don't mentally recall that receipt, you recall  
2 approximately what it was, but it's --  
3 A. **Yeah. That's a guesstimate, yeah.**  
4 Q. Okay. You mentioned -- you mentioned -- because some of these  
5 that you burned after having downloaded them, did you back up  
6 any of your films? Did you, you know, transfer some of the  
7 VHSes to a DVD for storage purposes, or did you make any  
8 electronic copies of the title, or store them in the cloud or  
9 anything like that?  
10 A. **I don't -- I don't know anything about the cloud, ma'am. I**  
11 wasn't making any copies. If I liked the movie I made sure to  
12 buy it. I -- to buy it when I saw it out.  
13 Q. I'm not asking if you bought them or not. I'm asking if,  
14 after you had bought the film, if you had transferred -- so  
15 you remember when VHS made the transition to DVD?  
16 A. **Yes.**  
17 Q. And everybody was hot on the bandwagon of let's transfer  
18 everything that was on VHS because it's a medium that  
19 disintegrates, or a lossy medium, let's transfer all of our  
20 home videos onto DVD. So there were services where you could  
21 send your videos away.  
22 A. **No, I never did that, ma'am.**  
23 Q. Okay. You didn't keep any of those ones that you downloaded  
24 and then later burned on a hard drive?  
25 A. **No.**

1 Q. Okay. So none of the titles that you are listing you have any  
2 access to at this point?  
3 A. **That's correct.**  
4 Q. And just for clarification I'm going to again share my screen  
5 because I talked about titles that weren't on the list and  
6 where I got those titles just so that you can see. This is  
7 Exhibit 5 created by your father, and it's a catalog of the  
8 titles that were submitted to the Ottawa County Sheriff's  
9 Department, which I don't know if Miles has picked up yet or  
10 not, but I simply did a copy paste from the Excel spreadsheet  
11 that this exhibit was taken from to find out whether it was on  
12 your list or not. I'm just explaining that's where I found --  
13 where -- where you will see whether it is on Exhibit 6 or not.  
14 So, for example, Mother Daughter Exchange Club, I highlight  
15 that, and then I go to your Exhibit 6, which we have said is  
16 the more complete list, and it shows it is not there. Do you  
17 follow that?  
18 A. **I don't know why, why it wouldn't be there, ma'am.**  
19 MS. VANDERBROEK: Okay. I had already asked my  
20 question about that, so I'm not going to ask it again. I just  
21 realized I hadn't showed that exhibit, so I wanted to show my  
22 work.  
23 That is all of my questions.  
24 MR. GREENGARD: I have no further.  
25 So, Anne, unless you have got something, I think we

1 can go off.  
2 MS. VANDERBROEK: I think so, yes.  
3 THE REPORTER: Counsel, would you like to order  
4 transcripts at this time?  
5 MS. VANDERBROEK: Yeah, I would like a copy of the  
6 transcript.  
7 MR. GREENGARD: Yes.  
8 (Whereupon this remote deposition was concluded at  
9 11:12 a.m.)

CERTIFICATE

STATE OF MICHIGAN )  
 )  
COUNTY OF KENT )

I, LORI J. COPE, Certified Shorthand Reporter and  
Notary Public, do hereby certify that the foregoing matter was  
taken remotely before me.

I FURTHER CERTIFY that this matter was taken in  
shorthand and thereafter transcribed by me and that it is a  
true and accurate transcript.

IN WITNESS WHEREOF, I have hereunto set my hand this  
1st day of February, of 2021, at Fremont, Michigan.

\_\_\_\_\_  
LORI J. COPE, CSR-4113, RPR  
Notary Public for Newaygo County  
My Commission Expires: 3-25-2021